SOIL SAMPLING REPORT

For

CENCO REFINING COMPANY

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CONFIDENTIAL

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1.0 INTRODUCTION

Cenco Refining is located at 12345 Lakeland Road in Santa Fe Springs, California. The Soil Sampling Plan dated January 27, 2000 was submitted to the Santa Fe Springs Fire Department (SFSFD) for approval. Following approval, ONYX Environmental Services (ONYX) representatives sampled the soil beneath and down gradient of the former drum storage area to provide a preliminary assessment of the potential loss of drum contents to the ground surface. In addition, Onyx sampled existing soil stockpiles #1, #2 and #3 to evaluate the effectiveness of the soil remediation project. The field activities, laboratory analytical results, findings and recommendations are summarized below in Sections 2.0 through 4.0.

2.0 DESCRIPTION OF FIELD ACTIVITIES

On February 3, 2000, two (2) soil samples (S8–S9) were collected at a depth of approximately 1-2 feet below ground surface (bgs) beneath the former drum storage area. Visually, no discolored or deteriorated asphalt was noted, therefore the samples were placed randomly in the locations indicated on Figure 1. The surface water runoff appears to drain to the northwest of the former drum storage area and two samples (S5-S6) were collected in low spots where water could potentially accumulate. Twelve (12) soil samples (SP1-SP4 and SP10-SP17) were collected from the stockpiled soil (Stockpiles #1, #2 and #3). One background sample was collected in the native soil to the northeast of stockpile #1 (see Figure 1) and one duplicate sample was collected at SP-10. In addition, a Photo Ionization Detector (PID) was used to screen the hydrocarbon vapor concentrations in the shallow borings. Sections 2.1 and 2.2 describe the soil sampling procedures and Quality Control/Quality Assurance (QA/QC) procedures.

2.1 Sampling Procedures

A concrete coring machine was used to core the asphalt, the core was removed, and a hand auger was used to penetrate the top 1-2 feet of soil. The soil sample was then driven into a brass-lined sampling tube. The samples were sealed with Teflon® and plastic caps, labeled and placed in an iced cooler. No soil samples were composited. The sampling equipment was decontaminated prior to use and between samples with non-phosphate detergent, and rinsed with potable and distilled water. Appropriate chain of custody documentation was followed throughout field and laboratory procedures and the chain of custody form is provided in Appendix A. All field activities were completed under the direct supervision of Susan Goss, R.G., ONYX. The samples

were hand-delivered to a West Coast Analytical Service at 9840 Alburtis Avenue in Santa Fe Springs, California by Susan Goss, R.G. for analysis.

2.2 Quality Assurance/Quality Control (QA/QC)

The following QA/QC procedures were followed; including a trip blank, an equipment blank, a field duplicate and one background sample. The trip blank was used to detect any contaminates that may have been introduced in the field, during transit, in bottle preparation, sample log-in or sample storage stages. A trip blank of distilled water was provided by the laboratory, transferred the sample cooler, recorded on the chain of custody documentation and analyzed for volatile organic compounds (VOCs) in accordance with EPA Method 8260B. The trip blank analytical results were non-detected (ND) for all of the 8260B VOC constituents.

An equipment blank was used to evaluate the decontamination procedures for the hand auger and sampler. Distilled water for the equipment blank was provided by the laboratory. The sampling equipment was decontaminated and the equipment blank water was rinsed over the equipment, collected and analyzed for VOCs in accordance with EPA Method 624/8260B, and semi-volatile compounds (SVOCs) in accordance with EPA Method 625/8270C. The equipment blank analytical results were non-detected (ND) for all of the 624/8260B VOC and 625/8270C SVOC constituents, except for 2 ug/l of Bis-2-ethylhexyl phthalate, which is plasticizer and was also detected in the laboratory method blank.

One blind field duplicate soil sample was collected at sample S10, from soil stockpile #1. Spatial variability is highly likely within the stockpiled soil, although this provides an indication if the laboratory results are consistent for the original and duplicate samples collected adjacent to one another. A relative percent difference (%RPD) was calculated for the original and duplicate sample results for lead, copper, zinc, benzo(g,h,i)perylene, chrysene, pyrene, benzo(a)pyrene, 4,4'-DDT, endosulfan sulfate, and heptachlor. The relative percent difference ranged from approximately 10% to 100 %, with most detections in sample SP-10 not replicated in sample Duplicate-1. This indicates that the stockpiled soil is not homogeneous or the laboratory did not achieve consistent results.

West Coast Analytical is a state-certified laboratory and adhered to the standard QA/QC protocol required by the state, including matrix spikes, matrix spike duplicate, blanks, etc, which are

provided in Appendix A. Based on the available QA/QC data, the laboratory results do not appear to be anomalous, although the %RPD was high for lead and zinc for results from sample SP-10 (See page 22 of 166, Appendix A).

3.0 LABORATORY ANALYTICAL METHODS AND RESULTS

As requested by the Santa Fe Springs Fire Department, the soil samples were analyzed for pH in accordance with EPA Method 9040/150.1, VOCs in accordance with EPA Method 8260B, SVOCs in accordance with EPA Method 8270C, polychlorinated biphenyls (PCBs) and organochlorine pesticides in accordance with EPA Method 8080, for total CCR Title 22 metals in accordance with EPA Method 6010 series. The full certified laboratory results, chain of custody and QA/QC documentation is provided in Appendix A.

All of the PID readings were 0 parts per million (ppm) of vapor, except borehole S7, which indicated 10.7 ppm hydrocarbons.

The laboratory results indicated that all of the 8260B VOCs were not detected (ND). The pH results ranged from 5.6 to 8.5, well within the non-hazardous range as established by California Code of Regulations (CCR) Title 22. Therefore the results for VOCs and pH were not summarized in a table format. The metal exceedances are summarized in Table 1, the detected SVOCs are summarized in Table 2 and the detected organochlorine pesticides and PCBs are summarized in Table 3. The available, generally-accepted regulatory guideline for each detected constituent is also listed on the tables. The U.S. E.P.A. Preliminary Remediation Goals (Smucker, October 1, 1999) were used as a regulatory guideline for SVOCs, pesticides, and PCBs. In addition, ten times (10 x) the Maximum Contaminant Level (MCL) (Marshack, March 1998) is listed in the tables as a ten times factor as compared to drinking water standards.

The metals were compared to the 10 x STLC and TTLC values as explained further herein. In California, metal wastes are considered "hazardous" if the Soluble Threshold Limit Concentrations (STLC) or the Total Threshold Limit Concentrations (TTLC) of regulated inorganic substances (metals) are equal to, or exceed established regulatory standards (CCR Title 22, Section 66261.24). In order for a waste to be considered "non-hazardous", analytical results must be less than both the STLC and TTLC regulation limits, as well as the other criteria including ignitability, pH, and fish toxicity. If an analytical result indicates (when analyzed for TTLC) that a concentration is less than the TTLC limit, but greater than the

STLC limit, it is possible that the waste is "hazardous." In concrete or soil, a factor of 10 times the STLC limit may be applied when comparing the analytical results for TTLC concentrations to the STLC regulatory limit. For example, if the TTLC concentration is less than the 10 times STLC regulatory limit, the STLC concentration cannot physically exceed the regulatory limit. This comparison, in this case, negates the need to analyze the sample for the STLC. The 10 x multiplier is the dilution factor associated with the Waste Extraction Test (WET). If the TTLC results exceed 10 x the STLC value, one may analyze the sample for the STLC to determine the portion of the sample that is soluble. All metal sample results were less than 10 x the STLC value, except for those summarized in Table 1. The STLC for copper was exceeded in sample SP12. The STLC, but not the TTLC was exceeded for lead in samples S7, S8, SP4, SP11, SP12, SP13, SP16, SP17 and background. The STLC and TTLC for zinc were exceeded in sample SP12.

Several SVOCs, organochlorine pesticides, and PCB constituents were detected in the parts per billion (ppb, µg/kg) range, although were all less than the available PRGs. Detected SVOCs included bis-2-ethylhexyl phthalate, benzo(g,h,i)perylene, chrysene, pyrene, benzo(a)anthracene, benzo(b+k)fluoranthenes, benzo(a)pyrene, fluoranthene, phenanthrene, butyl benzyl phthalate, and methyl napthalene. The detected pesticides included 4,4'-DDD, 4,4'-DDT, 4,4'-DDE, dieldrin, endosulfan, endosulfan sulfate, endrine aldehyde, endrin ketone, alpha chlordane, gamma chlordane, heptachlor, and heptachlor epoxide. Minor concentrations of endrin ketone, endrin aldehyde and gamma chlordane were detected in the background sample. The detected PCBs included PCB-1254 and PCB-1260. Concentrations exceeding the 10 x MCL guideline include bis-2-ethylhexyl phthalate in sample SP3, benzo(a)pyrene in samples S8, S9, and SP10, heptachlor epoxide in sample S6, heptachlor in sample Duplicate-1, and PCBs in samples S6, SP1, SP11, SP16 and SP17. Bis-2-ethylhexyl phthalate was also detected in the background and laboratory blank sample results.

4.0 FINDINGS AND RECOMMENDATIONS

On February 3, 2000, 16 soil samples were collected from beneath/down gradient from the former drum storage area (S5-S9), the soil stockpiles #1 (SP10-SP13), #2 (SP14-SP17) and #3 (SP1-SP4), as well as a background and duplicate location. A summary of the findings of this investigation are provided below:

- All pH values were reported in the non-hazardous range (CCR Title 22).
- Laboratory analytical results indicated ND concentrations for all EPA Method 8260B constituents at their respective laboratory detection limits.

- All Title 22 metals were less than 10 x the STLC values, except for sample SP12 which exceeded the STLC and TTLC for zinc and the STLC for copper and lead; and samples S7, S8, SP4, SP11, SP12, SP13, SP16, SP17 and background, which exceeded the STLC for lead.
- Several SVOCs were detected, but are well below the PRGs. Bis-2-ethylhexyl phthalate was detected above 10 x MCL in sample SP3, although it was also detected in the background and laboratory blank sample. Benzo(a)pyrene was detected above 10 x the MCL in sample S8, S9, and SP10.
- Several pesticides were detected, but concentrations were well below the PRGs and 10 x MCL, except for heptachlor, which exceeded the 10 x MCL guideline in sample Duplicate-1 and heptachlor epoxide which exceeded the 10 x MCL guideline in sample S6.
- PCB-1254 and PCB-1260 were detected, but were well below the PRGs. PCBs were detected above 10 x MCL in samples S6, SP1, SP11, SP16 and SP17.

Based on the above findings, the following recommendations are provided:

- The detected pesticides may be indicative of background conditions, and no further delineation with respect to these compounds is recommended.
- Samples S7, S8, SP4, SP11, SP12, SP13, SP16, SP17 and background should be analyzed for soluble lead (WET test). Sample SP12 should also be analyzed for soluble copper (WET test).
- Further lateral and vertical delineation of the SVOCs detected in borings S8 and S9 should be completed. The source of these SVOCs should be characterized with respect to refinery operations and profiled as such (see below).
- Further lateral and vertical delineation of the pesticides and PCBs detected in borings S6 should be completed and possible sources identified for profiling purposes.
- The source of the stockpiled soil needs to be identified to determine if the detected PCBs are from a TSCA source. Based on that information, characterization can be completed to determine the appropriate profiling and disposal method for the soil.
- Based on the proposed end-use of the stockpiled soil, additional laboratory analytical should be completed on the samples with the highest concentrations. The laboratory analytical shall include, but not be limited to; ignitability and 72-hour fish toxicity bioassay to declassify it with respect to Title 22 CCR hazardous criteria.
- The following are categories of regulated wastes that may need to be considered when determining hazard classification of the stockpiled soils. Even though the concentrations may be below the treatment standards, these are listed wastes, and waste derived from these sources is regulated:

F037-Petroleum refinery primary oil/water/solids separation sludge-Any sludge generated from the gravitational separation of oil/water/solids during the storage or treatment of process wastewaters and oily cooling wastewaters from petroleum refineries. Constituents of concern include:

Benzo(a)pyrene	0.061 ppm (ww)	3.4 ppm nww
Chrysene	0.059	3.4
Lead	0.69	na

F038-Petroleum refinery secondary (emulsified) oil/water/solids separation sludge and/or float generated from the physical and/or chemical separation oil/water/solids in process wastewaters and oily cooling wastewaters from petroleum refineries. Constituents of concern include:

Benzo(a)pyrene	0.061 ppm (ww)	3.4 ppm nww
Chrysene	0.059	3.4
Lead	0.69	na

K048-Dissolved air floatation float from the petroleum refining industry. Constituents of concern include:

Benzo(a)pyrene	0.061 ppm (ww)	3.4 ppm nww
Chrysene	0.059	3.4
Lead	0.69	na

K049-Slop oil emulsion solids from the petroleum refining industry. Constituents of concern include:

Benzo(a)pyrene	0.061 ppm (ww)	3.4 ppm nww
Chrysene	0.059	3.4
Lead	0.69	na

K050-Heat exchanger bundle cleaning sludge from the petroleum refining industry. Constituents of concern include:

Benzo(a)pyrene	0.061 ppm (ww)	3.4 ppm nww
Lead	0.69	na

K051-API separator sludge from the petroleum refining industry. Constituents of concern include:

Benzo(a)pyrene	0.061 ppm (ww)	3.4 ppm nww
Lead	0.69	na

K052-Leaded tank bottoms from the petroleum refining industry. Constituents of concern include:

Benzo(a)pyrene	0.061 ppm (ww)	3.4 ppm nww
Lead	0.69	na

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Report Reviewed By: _____

Gary Baldwin
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CLIENT: CENCO REFINING COMPANY **JOB #010-011**

This investigation has been performed and this report has been prepared under the direct supervision of Ms. Susan Goss, R.G., of ONYX Environmental Services (ONYX). Our professional services have been performed using that degree of care and skill ordinarily exercised under similar circumstances by other geologists and engineers practicing in this field. No other warranty, either expressed or implied, is made as to the professional advice in this report. ONYX is not responsible for any claims or damages associated with the interpretation of available information and this report should not be regarded as a guarantee that no further contamination, other than that which has been identified, is present beneath the subject property. In the event that changes in the nature of the property occur, or additional, relevant information about the property is brought to our attention, the conclusions and recommendations contained in this report may not be valid unless these changes and additional information are reviewed and the conclusions of this report are modified or verified in writing.

Susan F. Goss

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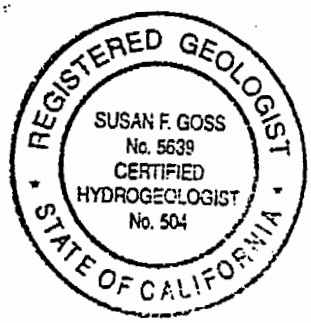
3/9/00
Date



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APPENDIX XI

CENCO

Versar INC.

April 18, 2000

Mr. Neil Norcross
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Subject: Work Plan for Further Characterization of Stockpiled Soil at the Bloomfield Property, CENCO Refining Company, 12345 Lakeland Road, Santa Fe Springs, California
Versar Project No. 3917-012

Dear Mr. Norcross:

Versar, Inc. (Versar) has prepared this letter work plan on behalf of the CENCO Refining Company (CENCO). This letter work plan addresses your request to perform further characterization of the stockpiled soil located at the Bloomfield Property, located just east of the CENCO refinery.

BACKGROUND

A total of 5,100 cubic yards of soil is currently located at the Bloomfield Property in three stockpiles, which are approximately 3 feet high. Two of the stockpiles contain approximately 2,050 cubic yards each, and the third stockpile contains approximately 1,000 cubic yards. The stockpiled soil originated on the former Lakeland Property, which has been redeveloped for warehousing and distribution.

The stockpiled soil is being considered, under California Regional Water Quality Control Board (RWQCB) - Los Angeles Region, General Waste Discharge Requirements (GWDR) Order No. 90-148, for use as backfill at the refinery and adjoining CENCO properties. The results of the characterization were presented in a letter prepared by Versar, dated March 12, 1999. Additional characterization of the stockpile was requested by the RWQCB on May 12, 1999. Versar submitted a letter work plan dated May 20, 1999 in response. Versar implemented the May 20, 1999 work plan later that month, and reported our findings in the Work Plan for Land Treatment of the Stockpiled Soil prepared by Versar, dated June 11, 1999. The sampling and analysis results for the stockpiled soil are presented in Table 1.

In February 2000, the Santa Fe Springs Fire Department (SFSFD) sampled the stockpiled soil for metals, semi-volatile organic compounds (SVOCs), and polychlorinated biphenyls (PCBs)

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and pesticides. One of twelve samples (SP12) collected by the SFSFD contained zinc at a concentration of 23,500 milligrams per kilogram (mg/kg), which is greater than the Total Threshold Limit Concentration (TTLC) for zinc of 5,000 mg/kg. Sample location SP12 does not correspond with the location of elevated petroleum hydrocarbons identified during previous characterization activities. One of the twelve samples (SP4) contained lead at a concentration of 350 mg/kg, which is less than the TTLC for lead of 1,000 mg/kg, but greater than 10 times the Soluble Threshold Limit Concentration (STLC) of 5 milligrams per liter (mg/L) for lead. Sample location SP4 does correspond with the location of elevated petroleum hydrocarbons identified during previous characterization activities.

SVOC concentrations in samples collected by the SFSFD were less than U.S. Environmental Protection Agency (EPA), Region 9 Preliminary Remediation Goals (PRGs) protective of human health. One sample (SP3-1.5) contained bis-2-ethylhexyl phthalate at a concentration of 0.06 mg/kg, which is less than the EPA PRG of 180 mg/kg; this compound is a common laboratory contaminant. Four samples (SP1-1.5, SP10-1.5, SP16-1.5, and SP17-1.5) contained concentrations of PCBs of 0.7 mg/kg, 0.01 mg/kg, 0.09 mg/kg, and 0.33 mg/kg, respectively, which are less than the EPA PRG of 1.0 mg/kg. The results of the SVOC, PCB, and pesticide sampling performed by SFSFD are presented in Tables 2 and 3.

CENCO collected two samples (SP12R1 and SP12R2) from locations within 2 feet of sample location SP12 to confirm previous sample results. Both samples were analyzed for total zinc using EPA Method 6010. Samples SP12R1 and SP12R2 contained zinc at concentrations of 7,660 and 9,830 mg/kg, respectively, which are greater than the TTLC of 5,000 mg/kg for zinc. Versar recommends that CENCO remove the soil in Grid Cell Nos. 7 and 8 (Figure 2) for offsite disposal at a Class I permitted facility. The results of CENCO and the SFSFD sampling and analyses for metals are presented in Table 4.

Three (SP4, SP16 and SP17) of the 12 samples collected by the SFSFD containing the highest total lead levels were also analyzed for soluble lead concentrations. Soluble lead concentrations were analyzed using the California Waste Extraction Test (WET) for comparison with the State of California STLC of 5 mg/L, and using the Toxicity Characteristic Leaching Procedure (TCLP) for comparison with the TCLP action level of 5 mg/L. Soluble lead concentrations using the WET method in samples SP16 (6.9 mg/L) and SP17 (6.8 mg/L) were greater than the STLC. Soluble lead concentrations using TCLP in all three samples were three orders of magnitude less than the TCLP action level confirming that the soil is not classified as a hazardous waste based on Resource Conservation and Recovery Act (RCRA) criteria.

Statistical analysis of total lead concentrations for the 14 samples collected by CENCO and SFSFD (Table 4) was performed using the EPA SW-846 method for evaluating whether a

media should be classified as a hazardous waste. Based on this analysis, the mean concentration (91 mg/kg) as well as the value of the upper bound of the 80 percent confidence interval (124 mg/kg) are much less than the TTLC for lead. Therefore, the stockpiled soil is not considered a California hazardous waste based on total lead levels.

Since the samples with the highest total lead concentrations were selected for soluble lead analysis, these results represent a conservative estimate of whether the stockpiled soils should be characterized as a California hazardous waste on a statistical basis. Soluble lead concentrations were only slightly higher than the STLC for lead of 5 mg/L, therefore, the stockpiled soil should not be classified as a California hazardous waste.

SOIL SAMPLING ACTIVITIES

To verify that the stockpiled soil can be used as backfill beneath paved areas, CENCO will collect 15 representative soil samples for total and soluble lead and zinc concentrations. Versar does not believe that concentrations of SVOCs, PCBs or pesticides detected in the stockpiled soil present a risk to human or environmental health, and their presence does not preclude land treatment of the stockpiled soil in accordance with RWQCB GWDR Order No. 90-148. The stockpiled soil will be additionally characterized using the following methodology:

- Subdivide each of the three stockpiles into grids containing 75 total cells, as shown in Figure 2.
- Collect 15 representative samples, in accordance with EPA SW-846 protocol, by randomly selecting cells for sampling, using randomly generated numbers (Table 5).
- Submit each discrete, randomly selected soil sample for analysis of total lead and zinc concentrations using EPA Method 6010, and soluble lead and zinc concentrations using the WET method specified in the California Code of Regulations (CCR), Title 22, Division 4.5, Chapter 11, Article 3, Section 66261.2.
- Using the additional data, perform statistical analysis using EPA SW-846 protocols for characterizing media.
- Present the results of the analyses as an addendum to the Work Plan for Land Treatment of the stockpiled soils at the Walker Property, prepared by Versar, dated June 11, 1999.

Soil samples will be collected using a slide-hammer fitted with a clean 2-inch by 6-inch brass liner. Upon retrieval, the ends of the sample liner will be covered with Teflon™ film and plastic caps. Sealed samples will be appropriately labeled for identification purposes, placed in resealable plastic bags and stored on ice in an insulated chest for transport and delivery to a California-certified laboratory for analysis. Chain-of-custody (COC) procedures, including the

7C	121	OIL	product	na	na	na	na	na	na	na	na	
7C	122	OIL	product	na	na	na	na	na	na	na	na	na
7C	123	WASTE OIL	EXCLUDED OVER 1 YR									
7C	124	OIL	product	na	na	na	na	na	na	na	na	na
7C	125	OIL	product	na	na	na	na	na	na	na	na	na
7C	126	OIL	product	na	na	na	na	na	na	na	na	na
7C	127	OIL	product	na	na	na	na	na	na	na	na	na
7C	128	OIL	product	na	na	na	na	na	na	na	na	na
7C	129	OIL	product	na	na	na	na	na	na	na	na	na
7C	130	OIL	product	na	na	na	na	na	na	na	na	na
7C	131	OIL	product	na	na	na	na	na	na	na	na	na
7C	132	OIL	product	na	na	na	na	na	na	na	na	na
7C	133	UNKNOWN	RCRA MT-CAL HAZ	thick brown liquid/opaque/single phase	negative	negative	insol/floats	negative	na	negative	negative	negative
7C	134	OIL	product	na	na	na	na	na	na	na	na	na
7C	135	OIL	product	na	na	na	na	na	na	na	na	na
7C	136	OIL	product	na	na	na	na	na	na	na	na	na
7C	137	OIL	product	na	na	na	na	na	na	na	na	na
7C	138	TARAWAY	product	na	na	na	na	na	na	na	na	na
7C	139	TARAWAY	product	na	na	na	na	na	na	na	na	na
7C	140	PAINT THINNER	product	na	na	na	na	na	na	na	na	na
7C	141	OIL	product	na	na	na	na	na	na	na	na	na
7C	142	OIL	product	na	na	na	na	na	na	na	na	na
7C	143	OIL	product	na	na	na	na	na	na	na	na	na
7C	144	OIL	product	na	na	na	na	na	na	na	na	na
7C	145	OIL	product	na	na	na	na	na	na	na	na	na
7C	146	OIL	product	na	na	na	na	na	na	na	na	na
7C	147	OIL	product	na	na	na	na	na	na	na	na	na
7C	148	OIL	product	na	na	na	na	na	na	na	na	na
7C	149	OIL	product	na	na	na	na	na	na	na	na	na
7C	150	OIL	product	na	na	na	na	na	na	na	na	na
7C	151	OIL	product	na	na	na	na	na	na	na	na	na
7C	152	OIL	product	na	na	na	na	na	na	na	na	na
7C	153	OIL	product	na	na	na	na	na	na	na	na	na
7C	154	OIL	product	na	na	na	na	na	na	na	na	na
7C	155	OIL	product	na	na	na	na	na	na	na	na	na
7C	156	OIL	product	na	na	na	na	na	na	na	na	na
7C	157	OIL	product	na	na	na	na	na	na	na	na	na
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7C	166	OIL	product	na	na	na	na	na	na	na	na	na
7C	167	OIL	product	na	na	na	na	na	na	na	na	na
7C	168	VENT SCRUB	product	na	na	na	na	na	na	na	na	na
7C	169	OIL	product	na	na	na	na	na	na	na	na	na
7C	170	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na
7C	171	OIL	product	na	na	na	na	na	na	na	na	na
7C	172	OIL	product	na	na	na	na	na	na	na	na	na
7C	173	OIL	product	na	na	na	na	na	na	na	na	na
7C	174	BETZ SLIMICIDE	product	na	na	na	na	na	na	na	na	na
7C	175	OIL	product	na	na	na	na	na	na	na	na	na
7C	176	OIL	product	na	na	na	na	na	na	na	na	na
7C	177	OIL	product	na	na	na	na	na	na	na	na	na
7C	178	OIL	product	na	na	na	na	na	na	na	na	na
7C	179	OIL	product	na	na	na	na	na	na	na	na	na
7C	180	OIL	product	na	na	na	na	na	na	na	na	na
7C	181	OIL	product	na	na	na	na	na	na	na	na	na

7C	182	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	183	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	184	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	185	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	186	BETZ SLIMICIDE	product	na	na	na	na	na	na	na	na	na	na
7C	187	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	188	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	189	MEROP 68 OIL	product	na	na	na	na	na	na	na	na	na	na
7C	190	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na	na
7C	191	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na	na
7C	192	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na	na
7C	193	ANTIFREEZE	product	na	na	na	na	na	na	na	na	na	na
7C	194	ANTIFREEZE	product	na	na	na	na	na	na	na	na	na	na
7C	195	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	196	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	197	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	198	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	199	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	200	ANTIFREEZE	product	na	na	na	na	na	na	na	na	na	na
7C	201	UNKNOWN PRODUCT	Ashland Product-need MSDS										
7C	202	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	203	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	204	POLYALKALYENE	product	na	na	na	na	na	na	na	na	na	na
7C	205	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	206	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	207	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	208	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	209	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	210	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	211	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	212	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	213	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	214	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	215	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	216	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	217	MEROPA 68 OIL	product	na	na	na	na	na	na	na	na	na	na
7C	218	MEROPA 68 OIL	product	na	na	na	na	na	na	na	na	na	na
7C	219	MEROPA 68 OIL	product	na	na	na	na	na	na	na	na	na	na
7C	220	MEROPA 68 OIL	product	na	na	na	na	na	na	na	na	na	na
7C	221	UNKNOWN	RCRA MT-CAL HAZ	thick brown liquid/opaque/single phase	negative	negative	insol/floats	negative	na	negative	negative	negative
7C	222	UNKNOWN	RCRA MT-CAL HAZ	thick brown liquid/opaque/single phase	negative	negative	insol/floats	negative	na	negative	negative	negative
7C	223	ANTIFREEZE	product	na	na	na	na	na	na	na	na	na	na
7C	224	ANTIFREEZE	product	na	na	na	na	na	na	na	na	na	na
7C	225	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	226	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	227	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	228	ANTIFREEZE	product	na	na	na	na	na	na	na	na	na	na
7C	229	OPTI-MEEN	product	na	na	na	na	na	na	na	na	na	na
7C	230	OPTI-MEEN	product	na	na	na	na	na	na	na	na	na	na
7C	231	ARCO EC-1	WASTE FLAMMABLE LIQUID, TOXIC	na	na	na	na	na	na	na	na	na	na
7C	232	ARCO EC-1	WASTE FLAMMABLE LIQUID, TOXIC	na	na	na	na	na	na	na	na	na	na
7C	233	ARCO EC-1	WASTE FLAMMABLE LIQUID, TOXIC	na	na	na	na	na	na	na	na	na	na

May 25, 20000

Mr. Steve Koester
City of Santa Fe Springs Fire Department
11300 Greenstone Avenue
Santa Fe Springs, CA 90670

Dear Steve:

After reviewing Cenco Refinery's response to our final report, I would like to make the following clarifications on the part of Onyx:

Drum #17 in Area 1 was labeled as toluene by Cenco. It was also labeled as an ingnible liquid (their characterization). As you can see by the results of our field fingerprint, Onyx did not determine that the materials were ignitible. However, toluene does have ignitible properties and was so identified by Cenco. Even if the material was not flammable it would be characterized as a hazardous waste-EPA code F005.

Drum #18 and # 19 were labeled as product drums containing isooctane. Since isooctane is flammable, no finerprint was conducted and the characterization was based on the properties of the product identified on the label.

Drum # 45 was visually inspected during a site walk after Cenco's letter was received. The material was mislabeled as used oil, which is consistent with the data reported by Onyx. Drum numbers 42-45 were composit sampled and field fingerprinted based on the same description being used for each.

Drum numbers 163 and 164 from Area 3 contained some residual liquids. The haz cat indicates the material was probably rainwater.

Drum #'s 124, 125, 131, 132, 133, 139, 142, 143, 145, 152, etc., were labeled as used oil or oily waste by the generator as reported. Any characterization or labeling errors were on the part of the generator. A field visit to Cenco after receipt of their response confirmed the labeling of the containers matches the descriptions in the initial report.

Drum # 151 did not contain oil filters. However, the container was labeled as oil and oil filters.

Drum #192 did contain vacuum residuals. A review of the field data confirms the original data for drum 192 was erroneous.

Onyx adheres to the acidic pH for drum 3C-193. The drum was unavailable for follow up testing during the field visit after receiving Cenco's response.

Drum # 889 from Area 5 contained incorrect data. The field file was reviewed, and agrees with Cenco's determination.

Finally, drum #'s 891 and 904 were not found during the May 12, 2000 site visit. Onyx stands by the determinations made in the initial report.

Thanks for arranging the follow up visit which allowed for clarification of these potential issues. If you have any further questions, feel free to call me at (626) 815-2200.

Sincerely,

Gary Baldwin

APPENDIX IX

CENCO

City of Santa Fe Springs

Headquarters Fire Station

11300 Greenstone Ave. • CA • 90670-4619 • (562) 944-9713 • Fax (562) 941-1817 • www.santafesprings.org

May 26, 2000

John D. R. Wright
Executive Vice President
CENCO Refining Company
12345 Lakeland Road
Santa Fe Springs, CA 90670

Dear Mr. Wright:

On April 5, 2000, a letter was sent from CENCO concerning the Final Report from ONYX Environmental Services. The Fire Department has met with Gary Baldwin of ONYX, Project Manager for the CENCO Drum Characterization, regarding the concerns outlined in your letter to. On May 12, 2000, Neil Norcross from your facility met with Gary Baldwin and Steve Koester, to re-examine some of the drums in question. All drums were located with the exception of a few. For the containers that could not be located, the original notes from ONYX will be used since no evidence other than those notes now exists.

The Fire Department will supply CENCO with a corrected edition of the Final Report or an addendum to the original Final Report. The information from the ONYX report will be used to issue a Final Inspection Report from the Fire Department. Should CENCO still have concerns regarding the information on the CENCO Drum Characterization report from ONYX, the concerns can be indicated in response to the Final Inspection Report from the Fire Department.

CENCO Item # 1

The Final Inspection Report from the Fire Department will include a copy of the map showing the locations of the seven areas in relation to the refinery. The map will indicate the areas that were impacted by the CEQA process. The actual areas affected were Area 4, Area 5 and Area 6. Your letter indicated that Area 5 and Area 6 were the two areas in the CEQA project area, but Area 4 would have also impacted the project.

CENCO Item # 2

CENCO noted the ONYX report's failure to acknowledge lack of environmental harm. It was not part of the ONYX contract to assess any type of harm, only to determine what was in the drums, collect evidence and identify any noted violations. Any type of assessment will be part of the Final Inspection Report by the Fire Department.

CENCO Item # 3

During the investigation by ONYX, there were several drums that could not be completely determined to be non-hazardous using field tests. Gary Baldwin asked Neil Norcross on several occasions to provide documentation on the waste determination of the drums. No documentation was ever provided. If CENCO wishes to provide documentation showing the waste to be non-hazardous, it can be done so as a rebuttal to the Final Inspection Report. Since the drums did not have any type of identifying markings on them showing some type of drum numbering system, it may be hard to prove any waste determination is linked to a specific drum. If no documentation can be linked to the drums in question, a hazardous waste determination will be attached to those drums.

CENCO Item # 4

The classification of the empty drums is not the result of how CENCO managed the drums, but in regard to the regulations concerning empty containers.

Title 22, Section 66261.7 describes the requirements for contaminated containers. There are provisions for the management of containers that once held hazardous materials. In order to retain an exemption from classifying a contaminated drum a hazardous waste, it must be managed in accordance with one of the list methods found in Section 66262.7(e). Section 66261.7(f) states that to utilize the exemptions in (e), the container must be managed within one year. Section 66261.7(p) states that any container not empty per the definitions in 66261.7(b) and (d) or otherwise exempt from regulation is a hazardous waste under Chapter 6.5 of Division 20 of the Health and Safety Code. The empty containers on the refinery were determined to not have been managed within one year, and were therefore determined to be a California hazardous waste.

CENCO Item #5

Item # 5 can be handled the same as Item # 3. If CENCO has documentation on the Potentially Hazardous Drums, they can be addressed after receiving the Final Inspection Report. Unless otherwise proven, they may be deemed as Non-RCRA hazardous waste.

CENCO Item # 6

Area 1

The waste description on drum 1C-17 will be changed to Waste Toluene. The notes for 1C-18 and 1C-19 showed the material tested positive for ignitability, were labeled as Isooctane which is a flammable liquid and the determination will stay as first reported. The description for drum 1C-45 will be changed to Waste Antifreeze, Non-RCRA hazardous waste liquid. The mentioned drums #163 and #164 are not part of Area 1, but are found in Area 3. The description for these drums will be changed to Industrial Wastewater based on the information from the field tests and not the labels on the drums. Drums 1C-32, 1C-44 and 1C-49 will be changed to Industrial Wastewater.

Area 3

For the drums listed in Area 3, (1), these drums were labeled as Various Oily Wastes by Powerine/CENCO. Unless the material in the drum was excluded from being an oily waste, the original description will stand. On some, it is clear that the material was not an oily waste and ONYX will amend the description to Industrial Wastewater.

For the drums listed in Area 3, (2), although these drums were RCRA empty, they were not California empty as defined in Title 22, Section 66261.7(b) and will be considered as Non-RCRA hazardous waste.

Drum 3C-151 was labeled as an Excluded Recyclable Material and will be treated as a Non-RCRA stored over one year (speculative accumulation). All of the drums that contained Vacuum Resid or Vacuum Coker will be changed to Non-Hazardous waste. For drum 3C-193, the pH of the liquid was a strong acid (pH of 0) which is consistent with Sulfuric Acid and the waste determination will remain as Waste Corrosive Liquid.

Area 5

The description for 5C-889 will be changed to Industrial Wastewater instead of Soil Borings. Drums 5C-891 and 5C-904 could not be located and the report will stay with the original description. For drum 5C-909, the Fire Department received the analysis on this container and the description will be changed to Industrial Wastewater. Drum 5C-932 was marked in error on the ONYX report and will be changed to Industrial Wastewater. On drums 5C-919, 5C-920 and 5C-925, the drums may have been RCRA empty, but were not California empty and will be classified as Non-RCRA hazardous waste.

Area 7

Drums 7C-133, 7C-221 and 7C-222 will be classified as Non-RCRA hazardous waste and not as RCRA waste.

The Fire Department is scheduled to complete the Final Inspection Report and have it ready for distribution in the second week of June. A copy of the updated ONYX report will be included with the Fire Department report. Should you have any questions concerning this letter, please contact Steve Koester, Environmental Protection Specialist, of this office.

Sincerely,

Neal Welland

Neal Welland
Fire Chief

NW/sk

Cc: Dave Klunk
Colin Lennard
Patricia Chen
Paul Ashworth
File Copy

Hand delivered to John Wright
w/ONYX revised Final Report.
5-26-00

Steve Koester

APPENDIX X

CENCO

In conclusion, CENCO believes that the City's assessment of the drums stored at the refinery supports the following conclusions:

- No significant environmental impacts were identified.
- Almost 1000 (well over half) of the drums were empty.
- Over 200 of the drums contained useful products that will be used by CENCO upon resumption of operations. With very limited exception, these drums were located inside the coke barn at the Bloomfield property.
- Approximately 100 drums were located in the refinery's hazardous waste accumulation area. This is the area of the refinery where CENCO is required to store hazardous waste pending removal from the site. Of the drums located in this area, only 12 of them were confirmed to actually contain hazardous waste. These included:

  a) 2 drums of WEMCO sludge (K051) (Drum #12, #20)

  b) 2 drums of red dye (Drum #33, #34)

  c) 3 drums of antifreeze (Drum #31, #40, #41)

  d) 1 drum of spent nickel-cadmium batteries (Drum #64)

  e) 3 drums of off-spec water treatment chemical (Drum #97, #98, #99)

  f) 1 drum of an ignitable liquid (Drum #101)

- Of the remaining 300 drums, only 6 of them contained wastes that have been determined to be hazardous. These included:

  a) One drum of red dye in Area 3 (Drum #158)

  b) One drum of antifreeze in Area 5 (Drum #880)

  c) One drum of oily material containing elevated metals in Area 6 (Drum #39)

  d) Three drums of ARCO gasoline additive (Drum #231, #232, #233) and one drum of red dye (Drum # 2) in Area 7

CENCO requests that the Onyx Report be revised in accordance with the foregoing comments. Because we understand that the City intends to use this document as a basis for negotiating an appropriate penalty in connection with this matter, it is essential that the report be factually accurate.

Thank you for your consideration in this matter.

For CENCO Refining Company,

John Wright

JDRW:md

cc: Meg Rosegay, PM&S

APPENDIX VIII

CENCO

Unique ID #	Container Contents	IDENTIFIED AS	PHYSICAL DESCRIPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?	oxidizer?
			rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
1	OIL RAGS	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
2	VAC RESID	NON-HAZ									
3	OILY GLOVES	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
4	USED OIL & TRASH	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
5	OILY RAGS & TRASH	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
6	OILY RAGS & TRASH	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
7	OIL RAGS	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
8	OILY RAGS & TRASH	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
9	OIL RAGS	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
10	DESSICANT	NON-HAZ	na	na	na	na	na	na	na	na	na
11	DESSICANT	NON-HAZ	na	na	na	na	na	na	na	na	na
12	WEMCO SLUDGE K051	listed haz waste	na	na	na	na	na	na	na	na	na
13	EMPTY	EMPTY	na	na	na	na	na	na	na	na	na
14	USED ROOFING CEMENT	POTENTIALLY CA HAZ	thick black liquid	negative	combusts	insol/heavy	negative	na	negative	negative	negative
15	USED OIL ABSORBENT	NON-HAZ	white	negative	negative	no	negative	na	negative	negative	negative
16	USED OIL ABSORBENT	NON-HAZ	white	negative	negative	no	negative	na	negative	negative	negative
17	TOLUENE	HAZARDOUS WASTE LIQUID (F005)	clear/creamy brown liquid w/solids	negative	negative	yes	negative	5	negative	negative	negative
18	ISOOCTANE	INDUSTRIAL WASTE	na	na	na	na	na	na	na	na	na
19	ISOOCTANE	INDUSTRIAL WASTE	na	na	na	na	na	na	na	na	na
20	WEMCO SLUDGE K051	listed haz waste	na	na	na	na	na	na	na	na	na
21	REFINERY TRASH	POTENTIALLY CA HAZ	rags & debris cont. w/oil	negative	negative	no	negative	na	negative	negative	negative
22	OILY GLOVES/RAGS	POTENTIALLY CA HAZ	oily rags	negative	negative	no	negative	na	negative	negative	negative
23	OILY GLOVES/RAGS	POTENTIALLY CA HAZ	oily rags	negative	negative	no	negative	na	negative	negative	negative
24	VARIOUS OILS	CA HAZ	reddish black/brown bilayer liq	negative	negative	sl sol	negative	5	negative	negative	negative
25	VARIOUS OILS	CA HAZ	reddish black/brown bilayer liq	negative	negative	sl sol	negative	5	negative	negative	negative
26	EMPTY	EMPTY	na	na	na	na	na	na	na	na	na
27	EMPTY	EMPTY	na	na	na	na	na	na	na	na	na
28	ETHYL MERCAPTAN ODERANT	product	na	na	na	na	na	na	na	na	na
29	VARIOUS OILS	CA HAZ	black liquid	negative	negative	no	negative	na	negative	negative	negative
30	VARIOUS OILS	CA HAZ	black liquid	negative	negative	no	negative	na	negative	negative	negative
Unique ID #	Container Contents	IDENTIFIED AS	PHYSICAL DESCRIPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?	oxidizer?
31	VAC OUT	POTENTIALLY CA HAZ	green clear liquid	negative	negative	sol	negative	10	negative	negative	negative
32	OIL CONTAMINATED WATER	INDUSTRIAL WASTE	brown single phased liquid	negative	negative	sol	negative	7	negative	negative	negative
33	RED DYE	WASTE FLAMMABLE LIQUID	thick black liquid, turns red w/w	negative	positive	insol	negative	na	negative	negative	negative
34	RED DYE	WASTE FLAMMABLE LIQUID	thick black liquid, turns red w/w	negative	positive	insol	negative	na	negative	negative	negative
35	TANK SCALE	POTENTIALLY CA HAZ/RCRA HAZ	could not open								
36	EMPTY OIL CANS	NON-HAZ	empty quart cans	na	na	na	na	na	na	na	na
37	OIL FILTERS	CA HAZ	car oil filtrers-appear drained	na	na	na	na	na	na	na	na
38	LUBE OIL	CA HAZ	brown liquid	negative	negative	insol	negative	na	negative	negative	negative
39	ETHYL MERCAPTAN ODERANT	product		na	na	na	na	na	na	na	na
40	USED ANTIFREEZE	CA HAZ	clear yellow green liquid	negative	negative	sol	negative	7	negative	negative	negative
41	USED ANTIFREEZE	CA HAZ	clear yellow green liquid	negative	negative	sol	negative	7	negative	negative	negative
42	USED OIL	CA HAZ	brown liquid	negative	negative	insol	negative	na	negative	negative	negative
43	USED OIL	CA HAZ	brown liquid	negative	negative	insol	negative	na	negative	negative	negative
44	USED OIL	INDUSTRIAL WASTE	brown liquid	negative	negative	insol	negative	na	negative	negative	negative
45	USED ANTIFREEZE	CA HAZ	brown liquid	negative	negative	insol	negative	na	negative	negative	negative
46	USED OIL	CA HAZ	brown liquid	negative	negative	insol	negative	na	negative	negative	negative
47	RCRA EMPTY	EMPTY	na	na	na	na	na	na	na	na	
48	UNKNOWN	INDUSTRIAL WASTE	brown/black	negative	negative	sl sol	negative	7	negative	negative	negative
49	UNKNOWN	OILY WASTE	brown/black	negative	negative	sl sol	negative	7	negative	negative	negative
50	USED OIL	CA HAZ	brown liquid	negative	negative	insol	negative	na	negative	negative	negative
51	SULFUR MIXED W/TANK BOTTOMS	POTENTIALLY CA HAZ/RCRA HAZ	muddy brown soil w/tph residue	negative	negative	insol	negative	na	negative	negative	negative
52	SULFUR MIXED W/TANK BOTTOMS	POTENTIALLY CA HAZ/RCRA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
53	SULFUR MIXED W/TANK BOTTOMS	POTENTIALLY CA HAZ/RCRA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative

54	SOIL FROM MONITORING WELLS	POTENTIALLY CA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
55	LAB WASTE	POTENTIALLY CA HAZ/RCRA HAZ	bottles containing various different chemicals, liquids and solids								
56	UNKNOWN	SULFUR MIXED W/TANK BOTTOMS	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
57	SOIL FROM MONITORING WELLS	POTENTIALLY CA HAZ	muddy brown solids (bilayer)	negative	negative	insol	negative	na	negative	negative	negative
58	WELL CUTTINGS	POTENTIALLY CA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
59	WELL CUTTINGS	POTENTIALLY CA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
60	SULFUR CONTAMINATED SOIL	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
Unique ID #	**Container Contents**										
61	UNKNOWN-id as SULFUR TANK BOTTOMS	POTENTIALLY CA HAZ/RCRA HAZ	brown sludge	negative	negative	insol	negative	na	negative	negative	negative
62	SULFUR CONTAMINATED SOIL	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
63	SULFUR & DIRT	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
64	USED BATTERIES	ni-cads-HAZARDOUS WASTE	could not open								
65	SULFUR MIXED W/DIRT	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
66	SULFUR DEBRIS	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
67	SULFUR MIXED W/DIRT	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
68	RUSTED SCALE	POTENTIALLY CA HAZ/RCRA HAZ									
69	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
70	SOIL W/RUST SCALE	POTENTIALLY CA HAZ/RCRA HAZ									
71	RUST & SCALE	POTENTIALLY CA HAZ/RCRA HAZ									
72	RUST & SCALE	POTENTIALLY CA HAZ/RCRA HAZ									
73	RUST & SCALE	POTENTIALLY CA HAZ/RCRA HAZ									
74	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
75	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
76	RUST & SCALE	POTENTIALLY CA HAZ/RCRA HAZ									
77	SULFUR MIXED W/DIRT	POTENTIALLY CA HAZ	green solids	negative	negative	soluble	negative	10	negative	negative	negative
78	SULFUR MIXED W/DIRT	POTENTIALLY CA HAZ	green solids	negative	negative	soluble	negative	10	negative	negative	negative
79	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	debris/white powder	negative	negative	sl sol	negative	9	negative	negative	negative
80	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
81	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
82	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
83	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
84	CATAYST USED	POTENTIALLY CA HAZ/RCRA HAZ	white spherical solids	na	na	na	na	na	na	na	na
85	ISOMERIZATION CATALYST	POTENTIALLY CA HAZ/RCRA HAZ									
86	CATAYST USED	POTENTIALLY CA HAZ/RCRA HAZ	white spherical solids	na	na	na	na	na	na	na	na
87	CATAYST USED	POTENTIALLY CA HAZ/RCRA HAZ	white spherical solids	na	na	na	na	na	na	na	na
88	SAND SCALES	POTENTIALLY CA HAZ/RCRA HAZ									
89	CATAYST USED	POTENTIALLY CA HAZ/RCRA HAZ	white spherical solids	na	na	na	na	na	na	na	na
90	SAND RUST & SCALE	POTENTIALLY CA HAZ/RCRA HAZ									
91	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
92	UNKNOWN	sandblast grit-POTENTIALLY CA/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
93	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
94	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
95	CHEM LINK IPL 6025 ADDITIVE	POTENTIALLY CA HAZ/RCRA HAZ	na	na	na	na	na	na	na	na	na
96	UNKNOWN SOLID	sulfur mixed w/dirt	muddy brown soils	negative	negative	insol	negative	3	negative	negative	negative
97	BETZ SLIMICIDE	PRODUCT	na	na	na	na	na	na	na	na	na
98	BETZ SLIMICIDE	PRODUCT	na	na	na	na	na	na	na	na	na
99	BETZ SLIMICIDE	PRODUCT	na	na	na	na	na	na	na	na	na
100	SODIUM HYPOCHLORITE	POTENTIALLY CA HAZ	clear product	negative	negative	sol	negative	9	negative	negative	negative
101	UNKNOWN	toluene-WASTE FLAMMABLE LIQUID	black liquid	negative	positive	insol	negative	na	negative	negative	negative
102	USED CATALYST	POTENTIALLY CA HAZ/RCRA HAZ	white spherical solids	na	na	na	na	na	na	na	na

103	VAC OUT LIQUID	POTENTIALLY CA HAZ	green liquid w/ammonia odor	negative	negative	sol	negative	10	negative	negative	negative
104	SAND BLASTING TANK 30006	POTENTIALLY CA HAZ/RCRA HAZ	brown powder	negative	negative	insol	negative	na	negative	negative	negative
105	SULFUR MIXED W/DIRT	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative
106	SULFUR MIXED W/DIRT	POTENTIALLY CA HAZ	brown solid w/white chunks	negative	negative	soluble	negative	3	negative	negative	negative

Unique ID #	Container Contents	Cont. Type	Drum Sealed	Acc. Date	Physical State	Physical Hazard	DOT Container?	Other Issues
1	LUBRICATING OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
2	POTASSIUM NITRITE	DP	YES	NA	LIQUID	PRODUCT-NA	NO	DRUM CRACKING.
3	DIETHANOLAMINE	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
4	DRILL OIL	DM	NO	NA	LIQUID	PRODUCT-NA	YES	DRUM DENTED
5	OIL	DM	YES	NA	LIQUID	PRODUCT-NA	YES	DRUM DENTED
6	AUTOMATIC TRANS OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
7	AUTOMATIC TRANS OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
8	SULIFURIC ACID	DP	YES	NA	LIQUID	PRODUCT-NA	YES	
9	TAR AWAY(FLAMMABLE)	DM	YES	NA	LIQUID	PRODUCT-NA	YES	
10	LUBRICANT OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
11	LUBRICANT OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	
12	LUBRICANT OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	
13	DUPONT METAL DEACTIVATOR	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
14	DUPONT METAL DEACTIVATOR	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
15	TRANSFORMER OIL	DM	YES	NA	LIQUID	PRODUCT-NA	YES	
16	REGAL OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	
17	DIETHANOLAMINE (SEALED)	DM	YES	NA	LIQUID	PRODUCT-NA	NO	
18	CYLINDER OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	RUSTED LID.
19	TURBINE OIL	DM	YES	NA	LIQUID	PRODUCT-NA	NO	
20	CAUSTIC SODA	DP	YES	NA	LIQUID	PRODUCT-NA	NO	
21	CAUSTIC SODA	DP	YES	NA	LIQUID	PRODUCT-NA	NO	
22	OIL	DM	YES	NA	LIQUID	PRODUCT-NA	YES	RUSTED LID.
23	CAPELLA OIL	DM	YES	NA	LIQUID	PRODUCT-NA	YES	RUSTED LID.
24	LUBE OIL	DM	YES	NA	LIQUID	PRODUCT-NA	YES	RUSTED LID.
25	FUEL DEHAZER	DM	YES	NA	LIQUID	PRODUCT-NA	YES	
26	FUEL DEHAZER	DM	YES	NA	LIQUID	PRODUCT-NA	YES	RUSTED LID.
27	CAUSTIC SODA	DP	YES	NA	LIQUID	PRODUCT-NA	NO	
28	CAUSTIC SODA	DP	YES	NA	LIQUID	PRODUCT-NA	NO	
NO FINGERPRINTING OF DRUMS IN AREA 2-ALL LABELED PRODUCTS.								

AREA 3C

Unique ID #	Container Contents	IDENTIFIED AS	PHYSICAL DESCRIPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?	Oxidizer?
1-114	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	NA
115	UNKNOWN	EMPTY	yellow clear liquid	negative	negative	insoluble	negative	7	negative	negative	negative
116	OIL	CA HAZ	cream translucent liquid/single-phase	negative	negative	insol/sinks	negative	7	negative	negative	negative
117	MICROBIAL DEGREASER	POTENTIALLY CA HAZ	cream translucent liquid/single-phase	negative	negative	insol/sinks	negative	7	negative	negative	negative
118	OIL	INDUSTRIAL WASTE	clear bi-layered liquid	negative	negative	soluble	negative	7	negative	negative	negative
119	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
120	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
121	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
122	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
123	VACUUM COKER	NON-HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative
124	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	clear brown sludge	negative	negative	part sol	negative	7	negative	negative	negative
125	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	clear brown sludge	negative	negative	part sol	negative	7	negative	negative	negative
126	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single-phase liquid	negative	negative	soluble	negative	7	negative	negative	negative
127	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
128	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
129	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
130	UNKNOWN	Industrial wastewater	trans. yellow single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative
131	UNKNOWN	oily water-POTENTIALLY CA HAZ	trans. yellow single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative
132	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single-phase liquid	negative	negative	soluble	negative	7	negative	negative	negative
133	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	clear brown sludge	negative	negative	part sol	negative	7	negative	negative	negative
134	VACUUM COKER	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
135	VACUUM COKER	NON-HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative
136	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
137	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
138	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
139	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear brown sludge	negative	negative	part sol	negative	7	negative	negative	negative
140	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
141	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
142	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative
143	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative
144	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	NA
145	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative
146	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative
147	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
148	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
149	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
150	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
151	INDUSTRIAL WASTEWATER	NON-HAZ	DRUM IS LISTED AS OIL/OIL FILTERS, HOWEVER, IT IS A CLOSED TOP DRUM THAT CONTAINS ONLY LIQUID (NO FILTERS)								
152	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	clear/liquid w/solids	negative	negative	soluble	negative	7	negative	negative	negative
153	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
154	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	BROWN LIQUID	negative	negative	soluble	negative	7	negative	negative	negative
155	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
156	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
157	UNKNOWN	TESTED FOR TTLC METALS	white solid	negative	negative	insol/floats	negative	na	negative	negative	negative
158	RED DYE	WASTE FLAMMABLE LIQUID	blue singlke phased liquid	negative	positive	insol/floats	negative	NA	negative	negative	negative
159	MT OP	NON-HAZ	NA	NA	NA	NA	NA	NA	NA	NA	NA
160	LIME CONTAMINATED W H2SO4	POTENTIALLY CA HAZ	white powder/solid	negative	negative	part sol/sinks	negative	7	negative	negative	negative
161	UNKNOWN	gasoline tank bottoms-POTENTIALLY RCRA LISTED/CA HAZ	brownish red solid	negative	negative	insol/floats	negative	na	negative	negative	negative
162	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
163	METHANOL	INDUSTRIAL WASTE	brown/bi-layer/liquid	negative	negative	soluble	negative	7	negative	negative	negative
Unique ID #	Container Contents	IDENTIFIED AS	PHYSICAL DESCRIPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?	Oxidizer?
164	METHANOL	INDUSTRIAL WASTE	brown/bi-layer/liquid	negative	negative	soluble	negative	7	negative	negative	negative
165	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
166	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
167	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear/liquid w/solids	negative	negative	soluble	negative	7	negative	negative	negative
168	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear/liquid w/solids	negative	negative	soluble	negative	7	negative	negative	negative
169	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
170	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative
171	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative

172	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear/liquid w/solids	negative	negative	soluble	negative	7	negative	negative	negative	
173	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear/liquid w/solids	negative	negative	soluble	negative	7	negative	negative	negative	
174	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
175	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
176	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
177	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
178	VARIOUS OILY WASTE	INDUSTRIAL WASTE	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
179	VARIOUS OILY WASTE	INDUSTRIAL WASTE	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
180	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
181	VACUUM RESID	NON-HAZ	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
182	VARIOUS OILY WASTE	INDUSTRIAL WASTE	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
183	VACUUM COKER	NON-HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
184	VACUUM COKER	NON-HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
185	VARIOUS OILY WASTE	INDUSTRIAL WASTE	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
186	SOLID ALKY NEUT. SWEEPINGS	POTENTIALLY CA HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
187	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single-phase liquid	negative	negative	soluble	negative	7	negative	negative	negative	
188	VISITROL	POTENTIALLY CA HAZ	clear/single phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative	
189	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
190	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
191	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
192	VACUUM RESID	NON-HAZ	brown single-phased liquid	negative	negative	insol/floats	negative	na	negative	negative	negative	
193	SULFURIC ACID	WASTE CORROSIVE LIQUID	brown single-phased liquid	negative	negative	soluble	negative	0	na	negative	positive	
194	UNKNOWN	industrial wastewater	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
195	UNKNOWN	industrial wastewater	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
196	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative	
197	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative	
198	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single-phase liquid	negative	negative	soluble	negative	7	negative	negative	negative	
199	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single-phase liquid	negative	negative	soluble	negative	7	negative	negative	negative	
200	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	brown bi-layered liquid	negative	negative	part.soluble	negative	7	negative	negative	negative	
201	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	brown bi-layered liquid	negative	negative	part.soluble	negative	7	negative	negative	negative	
202	VACUUM RESID	NON-HAZ	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
203	VACUUM RESID	NON-HAZ	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
204	VARIOUS OILY WASTE	INDUSTRIAL WASTE	rusty single-phased liquid	negative	negative	sol/sinks	negative	7	negative	negative	negative	
205	VARIOUS OILY WASTE	INDUSTRIAL WASTE	rusty single-phased liquid	negative	negative	sol/sinks	negative	7	negative	negative	negative	

206	VA[illegible] OILY WASTE	INDUSTRIAL WASTE	rusty single-phased liqu	negative	negative	sol/sinks	negative	7	negative	negative	negative	
207	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
208	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
209	VARIOUS OILY WASTE	INDUSTRIAL WASTE	brown bi-layered liquid	negative	negative	part.soluble	negative	7	negative	negative	negative	
210	VARIOUS OILY WASTE	EXCLUDED OVER 1 YR	brown bi-layered liquid	negative	negative	part.soluble	negative	7	negative	negative	negative	
211	VARIOUS OILY WASTE	INDUSTRIAL WASTE	clear single-phase liquid	negative	negative	soluble	negative	7	negative	negative	negative	
212	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative	
Unique ID #	**Container Contents**	**IDENTIFIED AS**	**PHYSICAL DESCRIPTION**	**RAD SCREEN**	**IGNITIBLE?**	**WATER SOL?**	**WATER RXN?**	**pH**	**Cyanides?**	**Sulfides?**	**Oxidizer?**	
213	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative	
214	VARIOUS OILY WASTE	INDUSTRIAL WASTE	orange/single-phased/liquid	negative	negative	soluble	negative	7	negative	negative	negative	
215	UNKNOWN	glycerine-NON HAZ	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
216	50% HYDROGEN PEROXIDE	industrial wastewater										
217	VACUUM RESID	NON-HAZ	clear single-phase liquid	negative	negative	soluble	negative	7	negative	negative	negative	
218	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
219	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
220	VACUUM RESID	NON-HAZ	black liquid/single phase	negative	positive	insol/floats	negative	na	negative	negative	negative	
221	OIL FILTERS	CA HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
222	OIL FILTERS	CA HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
223	SAMPLE CANS W/OIL	NON-HAZ	NA	NA	NA	NA	NA	NA	NA	NA	NA	
224	UNKNOWN	TESTED FOR TTLC METALS	black tar/solid	negative	negative	negative	negative	na	negative	negative	negative	
225	SAMPLE CANS W/OIL	NON-HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
226	SOLID NUETRAL ALKY SLUDGE	POTENTIALLY CA HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
227	VARIOUS OILY WASTE	INDUSTRIAL WASTE	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
228	VACUUM COKER	NON-HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
229	VACUUM COKER	NON-HAZ	black tar/solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
230	UNKNOWN	glycerine-NON HAZ	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
231	CONTAMINATED SOIL	POTENTIALLY CA HAZ	black tar/single-phased solid	negative	negative	insol/floats	negative	na	negative	negative	negative	
232	WASTE OIL	EXCLUDED OVER 1 YR	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
233	MONITORING WELL DYE	NON-HAZ	brown/opaque/liquid, single-phase	negative	negative	soluble	negative	7	negative	negative	negative	
234	UNKNOWN	soil borings-POTENTIALLY CA HAZ	brown single phased solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
235	CONTAMINATED SOIL	POTENTIALLY CA HAZ	black tar/single-phased solid	negative	negative	insol/floats	negative	na	negative	negative	negative	
236	CONTAMINATED SOIL	POTENTIALLY CA HAZ	black tar/single-phased solid	negative	negative	insol/floats	negative	na	negative	negative	negative	
237	UNKNOWN	Jet Clay-POTENTIALLY CA HAZ	BROWN SOLID	negative	negative	insol/sinks	negative	na	negative	negative	negative	
238	UNKNOWN	Jet Clay-POTENTIALLY CA HAZ	brown single phased solid	negative	negative	insol/sinks	negative	na	negative	negative	negative	
239	UNKNOWN	TESTED FOR TTLC METALS	BROWN SOLID	negative	negative	insol/sinks	negative	na	negative	negative	negative	
240	CONTAMINATED SOIL	POTENTIALLY CA HAZ	black tar/single-phased solid	negative	negative	insol/floats	negative	na	negative	negative	negative	
241	UNKNOWN	TESTED FOR TTLC METALS	brown solid single phase	negative	negative	part. Sol	negative	7	negative	negative	negative	
242	UNKNOWN	glycerine-NON HAZ	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative	
243	MICROBIAL DEGREASER	POTENTIALLY CA HAZ	cream translucent liquid/single-phase	negative	negative	part. Sol	negative	7	negative	negative	negative	

Unique ID #	Container Contents	IDENTIFIED AS	PHYSICAL DESCRIPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?	oxidizer?
1-95	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	
96	UNKNOWN	Industrial Waste Water	orange/opaque/liquid/single phase	negative	negative	soluble	negative	7	negative	negative	nagative
97-138	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	
139	UNKNOWN	Industrial Waste Water	brown liquid	negative	negative	soluble	negative	7	negative	negative	nagative
140-452	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	
453	PREV. CONTAINED SODIUM AMMONIUM VANADATE	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	NA
454	PREV. CONTAINED SODIUM AMMONIUM VANADATE	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	NA
455-558	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	
559	PREV. CONTAINED ETHYLENE DICHLORIDE	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	NA
560-660	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	
661	No drum was assigned this number										
662-744	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	
745	SODIUM HYPOCHLORITE	Industrial Waste Water	NA	NA	NA	NA	NA	NA	NA	NA	NA
746	RCRA EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	NA
747-879	EMPTY	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	
880	UNKNOWN	Antifreeze- CA HAZ	green clear liquid	negative	negative	soluble	negative	7	negative	negative	negative
881	UNKNOWN	RCRA EMPTY-CA HAZ EMPT	NA	NA	NA	NA	NA	NA	NA	NA	NA
882	UNKNOWN	RCRA EMPTY-CA HAZ EMPT	black liquid	negative	negative	soluble	negative	7	negative	negative	negative
883	CAUSTIC SOLUTION	RCRA CORROSIVE WASTE	clear liquid	negative	negative	soluble	negative	13	negative	negative	negative
884	UNKNOWN	industrial wastewater	brown bilayered liquid	negative	negative	soluble	negative	7	negative	negative	negative
885	UNKNOWN	industrial wastewater	brown bilayered liquid	negative	negative	soluble	negative	7	negative	negative	negative
886	UNKNOWN	RCRA EMPTY-CA HAZ EMPT	na	na	na	na	na	na	na	na	na
887	UNKNOWN	Refinery Trash-NON-HAZ	black solids	negative	negative	insoluble	negative	7	negative	negative	negative
888	UNKNOWN	soil borings-POTENTIALLY CA HAZ	brown solids	negative	negative	insol	negative	na	negative	negative	negative
889	UNKNOWN	industrial wastewater	brown bilayered liquid	negative	negative	soluble	negative	na	negative	negative	negative
890	UNKNOWN	soil borings-POTENTIALLY CA HAZ	brown solids	negative	negative	insol	negative	na	negative	negative	negative
891	UNKNOWN	NON-HAZ	white solid	negative	negative	insol	negative	8	negative	negative	negative
892	UNKNOWN	industrial wastewater	clear/opaque/liquid/single phase	negative	negative	soluble	negative	7	negative	negative	negative
893	50% HYDROGEN PEROXIDE	INDUSTRIAL WASTEWATER	NA	NA	NA	NA	NA	NA	NA	NA	NA
894	UNKNOWN	Industrial Wastewater	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative
895	UNKNOWN	Industrial Wastewater	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative
896	UNKNOWN	Industrial Wastewater	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative
897	UNKNOWN	Industrial Wastewater	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative
898	DUPONT METAL DEACTIVATOR	POTENTIALLY CA HAZ	NA	NA	NA	NA	NA	NA	NA	NA	
899	POTASSIUM NITRITE	Industrial Waste Water	yellow single phased liquid	negative	negative	soluble	negative	7	negative	negative	negative
900	DUPONT METAL DEACTIVATOR	POTENTIALLY CA HAZ	NA	NA	NA	NA	NA	NA	NA	NA	
901	Canvas Bags	NON-HAZ	NA	NA	NA	NA	NA	NA	NA	NA	NA
902	UNKNOWN	Spill Control Supplies	NA	NA	NA	NA	NA	NA	NA	NA	
903	UNKNOWN	Spill Control Supplies	NA	NA	NA	NA	NA	NA	NA	NA	
904	UNKNOWN	NON-HAZ	white solid	negative	negative	insol	negative	8	negative	negative	negative
905	UNKNOWN	Industrial Wastewater	negative	negative	negative	soluble	7	neg	negative	negative	
906	EMPTY	EMPTY	residue	NA	NA	NA	NA	NA	NA	NA	
907	UNKNOWN	Industrial Wastewater	brown bilayered liquid	negative	negative	soluble	negative	7	negative	negative	negative
908	UNKNOWN	sampled for ttlc metals	brown/sludge/opaque/bi-layer	negative	negative	partially soluble	negative	7	negative	negative	negative
909	ETHYLENE DICHLORIDE	INDUSTRIAL WASTE	brown single phase liquid	negative	negative	soluble	negative	8	negative	negative	negative
910	UNKNOWN	Non-haz (same as above)	brown/sludge/opaque/bi-layer	negative	negative	soluble	negative	7	negative	negative	negative
911	UNKNOWN	Refinery Trash-NON-HAZ	black solids	negative	negative	insoluble	negative	7	negative	negative	negative
912	UNKNOWN	Refinery Trash-NON-HAZ	black solids	negative	negative	insoluble	negative	7	negative	negative	negative
913	RCRA EMPTY	EMPTY									
914	RCRA EMPTY	EMPTY									

Unique ID #	Container Contents	IDENTIFIED AS	PHYSICAL DESCRIPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?	oxidizer?
915	RCRA EMPTY	EMPTY									
916	LIQUID OIL	RCRA EMPTY-CA HAZ	brown bilayered liquid	negative	positive	soluble	negative	7	negative	negative	negative
917	UNKNOWN	slimicide-CA HAZ	yellow single phased liquid	negative	negative	soluble	negative	8	negative	negative	negative
918	UNKNOWN	Industrial Wastewater	brown bilayered liquid	negative	negative	soluble	negative	7	negative	negative	negative
919	LIQUID OIL	INDUSTRIAL WASTE	NA	NA	NA	NA	NA	NA	NA	NA	NA
920	LIQUID OIL	INDUSTRIAL WASTE	NA	NA	NA	NA	NA	NA	NA	NA	NA
921	UNKNOWN	RCRA Empty-CA HAZ	NA	NA	NA	NA	NA	NA	NA	NA	NA
922	LIQUID OIL	INDUSTRIAL WASTE	NA	NA	NA	NA	NA	NA	NA	NA	NA
923	UNKNOWN	vac resid-NON-HAZ	black solid	negative	positive	insoluble	negative	NA	negative	negative	negative
924	UNKNOWN	vac resid-NON-HAZ	tarry plastic solid	negative	negative	insoluble	negative	NA	negative	negative	negative
925	UNKNOWN	USED OIL-CA HAZ	black bilayered liquid	negative	negative	soluble	negative	7	negative	negative	negative
926	UNKNOWN	INDUSTRIAL WASTE	black bilayered liquid	negative	negative	part. sol	negative	7	negative	negative	negative
927	UNKNOWN	Industrial Wastewater	brown bilayered liquid	negative	negative	soluble	negative	7	negative	negative	negative
928	UNKNOWN	Refinery Trash-NON-HAZ	black solids	negative	negative	insoluble	negative	7	negative	negative	negative
929	RCRA Empty	EMPTY	NA	NA	NA	NA	NA	NA	NA	NA	NA
930	UNKNOWN	vac resid-NON-HAZ	black solid	negative	negative	insoluble	negative	NA	negative	negative	negative
931	RCRA Empty	EMPTY	thick brown liquid	negative	negative	insol/floats	negative	na	negative	negative	negative
932	Oil	EXCLUDED OVER 1 YR	brown single phased liquid	negative	negative	sol	negative	7	negative	negative	negative
933	UNKNOWN	oily absorbent-NON-HAZ	na	na	na	na	na	na	na	na	na
934	UNKNOWN	industrial wastewater	brown bilayered liquid	negative	negative	part sol/floats	negative	7	negative	negative	negative
935	Glycerine	NON-HAZ	clear liq	negative	negative	sol	negative	7	negative	negative	negative
936	oil	EXCLUDED OVER 1 YR	NA	NA	NA	NA	NA	NA	NA	NA	
937	UNKNOWN	industrial wastewater	clear bi-layered liquids	negative	negative	soluble	negative	7	negative	negative	negative
938	EMPTY	EMPTY	na	na	na	na	na	na	na	na	na
939	RCRA Empty	EMPTY	na	na	na	na	na	na	na	na	na

Unique ID #	Container Contents	IDENTIFIED AS	PHYSICAL DESCRIPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?		
1	EMPTY	EMPTY-CA HAZ	na	na	na	na	na	na	na	na	na	
2	EMPTY	EMPTY-CA HAZ	na	na	na	na	na	na	na	na	na	
3	EMPTY	EMPTY-CA HAZ	na	na	na	na	na	na	na	na	na	
4	EMPTY	EMPTY-CA HAZ	na	na	na	na	na	na	na	na	na	
5	UNKNOWN	mosquito water	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative		
6	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
7	UNKNOWN	monitoring well water	brown sludge	negative	negative	soluble	negative	7	negative	negative		
8	UNKNOWN	industrial wastewater	clear single phased liquid	negative	negative	soluble	negative	7	negative	negative		
9	UNKNOWN	Sampled for TTLC Metals	white solid	negative	negative	soluble	negative	7	negative	negative	violent rxn w/acid	
10	INDUSTRIAL WATER	NON-HAZ	Opaque liquid, single phase	negative	negative	soluble	negative	7	negative	negative	negative	
11	UNKNOWN	industrial wastewater										
12	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
13	UNKNOWN	Sampled for TTLC Metals	white solid	negative	negative	insol/sinks	negative	7	negative	negative		
14	UNKNOWN	Sampled for TTLC Metals	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
15	UNKNOWN	monitoring well water	clear liquid	negative	negative	soluble	negative	7	negative	negative		
16	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
17	SCALE FINES	POTENTIALLY RCRA/CA	brown single phased solid	negative	negative	insol	negative	7	negative	negative		
18	UNKNOWN	SOIL BORINGS-NON-HA	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
19	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
20	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
21	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
22	UNKNOWN	SOIL BORINGS-NON-HA	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
23	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
24	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
25	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
26	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
27	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
28	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
29	UNKNOWN	SOIL BORINGS-NON-HA	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
30	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
31	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
32	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
33	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
34	UNKNOWN	SOIL BORINGS-NON-HA	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
35	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
36	UNKNOWN	EMPTY-CA HAZ	na	na	na	na	na	na	na	na	na	
37	UNKNOWN	EMPTY-CA HAZ	na	na	na	na	na	na	na	na	na	
38	UNKNOWN	SOIL BORINGS-NON-HA	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
39	UNKNOWN	Sampled for TTLC Metals	black single phase solid	negative	negative	insol/sinks	negative	7	negative	negative		
40	UNKNOWN	SOIL BORINGS-NON-HA	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
41	UNKNOWN	SOIL BORINGS-NON-HAZ										
42	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		
43	SOIL BORINGS	NON-HAZ	brown single phased solid	negative	negative	insol/sinks	negative	7	negative	negative		

Container Area	ue ID #	Container Contents	IDENTIFIED AS	PHYSICAL D IPTION	RAD SCREEN	IGNITIBLE?	WATER SOL?	WATER RXN?	pH	Cyanides?	Sulfides?	idizer?
7C	1	UNKNOWN	Waste Water-reactive Solid, NOS	white translucent crystals	negative	negative	sl, soluble	reactive	7	negative	negative	negative
7C	2	UNKNOWN	red dye-WASTE FLAMMABLE LIQUID	black/brown single phased liquid	negative	positive	insol/floats	negative	7	negative	negative	negative
7C	3	RED DYE W/XYLENE	product	na	na	na	na	na	na	na	na	na
7C	4	RED DYE W/XYLENE	product	na	na	na	na	na	na	na	na	na
7C	5	WHITE CATALYST	product	na	na	na	na	na	na	na	na	na
7C	6	WHITE CATALYST	product	na	na	na	na	na	na	na	na	na
7C	7	WHITE CATALYST	product	na	na	na	na	na	na	na	na	na
7C	8	NALCO CORROSION INHIBITOR	product	na	na	na	na	na	na	na	na	na
7C	9	LUBRICATING OIL	product	na	na	na	na	na	na	na	na	na
7C	10	LUBRICATING OIL	product	na	na	na	na	na	na	na	na	na
7C	11	LUBRICATING OIL	product	na	na	na	na	na	na	na	na	na
7C	12	LUBRICATING OIL	product	na	na	na	na	na	na	na	na	na
7C	13	PERCHLOROETHYLENE	product	na	na	na	na	na	na	na	na	na
7C	14	PERCHLOROETHYLENE	product	na	na	na	na	na	na	na	na	na
7C	15	OIL	product	na	na	na	na	na	na	na	na	na
7C	16	OIL	product	na	na	na	na	na	na	na	na	na
7C	17	OIL	product	na	na	na	na	na	na	na	na	na
7C	18	OIL	product	na	na	na	na	na	na	na	na	na
7C	19	AUTOMOBILE BLUE DYE	product	na	na	na	na	na	na	na	na	na
7C	20	AUTOMOBILE BLUE DYE	product	na	na	na	na	na	na	na	na	na
7C	21	AUTOMOBILE BLUE DYE	product	na	na	na	na	na	na	na	na	na
7C	22	UNKNOWN	Oily Waste-EXCLUDED RECYCLE OVER 1 YR	thick brown liquid/opaque/single phase	negative	negative	insol/floats	negative	na	negative	negative	negative
7C	23	CYLINDER OIL	product	na	na	na	na	na	na	na	na	na
7C	24	CYLINDER OIL	product	na	na	na	na	na	na	na	na	na
7C	25	CYLINDER OIL	product	na	na	na	na	na	na	na	na	na
7C	26	CYLINDER OIL	product	na	na	na	na	na	na	na	na	na
7C	27	CYLINDER OIL	product	na	na	na	na	na	na	na	na	na
7C	28	CYLINDER OIL	product	na	na	na	na	na	na	na	na	na
7C	29	CYLINDER OIL	product	na	na	na	na	na	na	na	na	na
7C	30	BETZ LAYUP # 1	product	na	na	na	na	na	na	na	na	na
7C	31	OVERPACK W/AUTO BLUE DYE	product	na	na	na	na	na	na	na	na	na
7C	32	BETZ LAYUP # 1	product	na	na	na	na	na	na	na	na	na
7C	33	REGAL OIL # 390	product	na	na	na	na	na	na	na	na	na
7C	34	REGAL OIL # 390	product	na	na	na	na	na	na	na	na	na
7C	35	REGAL OIL # 390	product	na	na	na	na	na	na	na	na	na
7C	36	MAROPA OIL 320	product	na	na	na	na	na	na	na	na	na
7C	37	MAROPA OIL 320	product	na	na	na	na	na	na	na	na	na
	38	URSA OIL	product	na	na	na	na	na	na	na	na	na
7C	39	URSA OIL	product	na	na	na	na	na	na	na	na	na
7C	40	URSA OIL	product	na	na	na	na	na	na	na	na	na
7C	41	URSA OIL	product	na	na	na	na	na	na	na	na	na
7C	42	REGAL OIL # 68	product	na	na	na	na	na	na	na	na	na
7C	43	REGAL OIL # 68	product	na	na	na	na	na	na	na	na	na
7C	44	REGAL OIL # 68	product	na	na	na	na	na	na	na	na	na
7C	45	REGAL OIL # 68	product	na	na	na	na	na	na	na	na	na
7C	46	BRONZE LIQUID DYE	product	na	na	na	na	na	na	na	na	na
7C	47	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na
7C	48	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na
7C	49	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na
7C	50	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na
7C	51	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na
7C	52	RANDO OIL	product	na	na	na	na	na	na	na	na	na
7C	53	MEROPA OIL	product	na	na	na	na	na	na	na	na	na
7C	54	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na
	55	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na
7C	56	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na
7C	57	RANDO OIL	product	na	na	na	na	na	na	na	na	na
7C	58	RANDO OIL	product	na	na	na	na	na	na	na	na	na
7C	59	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na

7C	60	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na	na
7C	61	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na	na
7C	62	DIETHANOLAMINE	product	na	na	na	na	na	na	na	na	na	na
7C	63	REGAL OIL 320	product	na	na	na	na	na	na	na	na	na	na
7C	64	REGAL OIL 320	product	na	na	na	na	na	na	na	na	na	na
7C	65	REGAL OIL 320	product	na	na	na	na	na	na	na	na	na	na
7C	66	REGAL OIL 320	product	na	na	na	na	na	na	na	na	na	na
7C	67	BETZ DEPOSIT CONTROL 40K	product	na	na	na	na	na	na	na	na	na	na
7C	68	BETZ SLIMICIDE # 31	product	na	na	na	na	na	na	na	na	na	na
7C	69	UNKNOWN	RCRA Empty-CA HAZ	brown/sludge/bilayer/opaque	negative	negative	soluble	negative	7	negative	negative	negative	
7C	70	TRANSFORMER OIL	product	na	na	na	na	na	na	na	na	na	na
7C	71	REGAL OIL 320	product	na	na	na	na	na	na	na	na	na	na
7C	72	REGAL OIL 320	product	na	na	na	na	na	na	na	na	na	na
7C	73	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	74	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	75	AQUA AMMONIA	product	na	na	na	na	na	na	na	na	na	na
7C	76	REGAL OIL	product	na	na	na	na	na	na	na	na	na	na
7C	77	REGAL OIL	product	na	na	na	na	na	na	na	na	na	na
7C	78	REGAL OIL	product	na	na	na	na	na	na	na	na	na	na
7C	79	REGAL OIL	product	na	na	na	na	na	na	na	na	na	na
7C	80	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	81	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	82	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	83	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	84	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	85	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	86	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	87	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	88	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	89	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	90	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	91	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	92	TAR AWAY	product	na	na	na	na	na	na	na	na	na	na
7C	93	TAR AWAY	product	na	na	na	na	na	na	na	na	na	na
7C	94	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	95	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	96	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	97	TAR AWAY	product	na	na	na	na	na	na	na	na	na	na
7C	98	TAR AWAY	product	na	na	na	na	na	na	na	na	na	na
7C	99	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	100	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	101	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	102	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	103	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	104	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	105	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	106	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	107	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	108	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	109	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	110	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	111	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	112	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	113	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	114	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	115	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	116	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	117	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	118	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	119	OIL	product	na	na	na	na	na	na	na	na	na	na
7C	120	OIL	product	na	na	na	na	na	na	na	na	na	na

APPENDIX V

CENCO

November 23, 1999

In the Matter of:

CENCO Refinery
12345 Lakeland
Santa Fe Springs, CA 90670

Preliminary Assessment for Hazardous Waste Violations

INTRODUCTION

On September 28, 1999, Richard Kallman and Steve Koester of the Santa Fe Springs Fire Department inspected CENCO Refinery for the Hazardous Waste Generator Program. During the inspection, it became apparent to the inspectors that the violations were so extensive that they could not be fully characterized during the initial inspection. On a verbal agreement with the City Manager, the Fire Chief and CENCO management, the areas where the waste was being stored was secured by the Fire Department until the area could be further evaluated with adequate resources.

The secured areas consist of seven (7) locations at the refinery, with one area located at the wash pad at the 12345 Lakeland address and the other six (6) areas are at the property east of the main refinery and east of Bloomfield Ave. All of the locations for the storage of the waste are outside except for materials that are being stored inside of their coke barn. The areas have secured by barrier tape or by chains. Pictures of the storage arrangements were taken to maintain the original orientation of the drums from September 28, 1999.

The City of Santa Fe Springs and CENCO Refinery came to a formal written agreement on how the site was to be characterized and how payment for the

characterization would be handled. A Scope of Work was drafted and the City submitted a request for bid from several environmental firms. Prior to having the work completed for the Site Characterization, a Preliminary Assessment Report was requested by the City showing a sampling of the violations and the severity of the violations.

DETERMINATION OF VIOLATIONS

On November 3, 1999, Steve Koester, Environmental Protection Specialist, with the Santa Fe Springs Fire Department, inspected the CENCO property to document specific violations that were noted on September 28, 1999, but were not documented with photos or samples. Dated photographs were taken of some of the waste containers and the hazardous waste generator violations relating to that container were recorded.

Picture # 1 is a west facing view of Storage Area #3. The picture shows several 55-gallon steel drums, some with material in them and some that are empty. Most of the drums are in poor condition and some drums have leaked. The labels on the drums indicate that the drums are several years old (around 4 years). There are approximately 200 drums in Area #3.

Picture #2 is in Area #3 and shows a 55-gallon steel drum (SFSFD #1) of what at one time contained "Methanol". The drum is in a waste storage area, but does not have a waste label as per 22CCR66262.34(f)(3), no accumulation date as per 22CCR66262.34(f)(2), storage exceeds 90 day rule per 22CCR66262.34(C), waste not being stored in a container of good condition per 22CCR66265.171 and not being stored with proper aisle space per 22CCR66262.34(d)(2).

Picture #3 is in Area #3 and shows a 55-gallon steel drum (SFSFD #2) labeled empty, but is open and contains some type of liquid in it. The container was not managed within one year as per 22CCR66261.7(e), is not legally empty as per 22CCR261.7(b), has not had a proper waste determination made on the contents per 22CCR262.11 and container is not properly sealed as per 22CCR66265.173(b).

Picture #4 is an east facing shot of Storage Area #3 showing the deteriorated drums and no aisle space between the containers as required per 22CCR66262.34(d)(2). Some of the containers are open, but it could not be

determined if they contained any material in them. The drums have not been managed within one year as per 22CCR66261.7(e) for empty containers

Picture #5 is a Picture of a 55-gallon steel drum (SFSFD #3) that is labeled as a "Excluded Recyclable Waste" in Storage Area #3. The label on the drum indicates that the material has been onsite for more than one year (Speculative Accumulation) and cannot be considered a "Excluded Recyclable Waste" per CH&SC 25144(c)(4).

Picture #6 is a 30-gallon steel drum (SFSFD #4) located in Area #3. The drum has failed in the lower third of the drum and has leaked onto the ground. The drum has a "excluded recyclable material" label on the drum, but the contents would indicate that it would not meet that definition since the waste is some kind of ink. The accumulation time on the drum is not accurate because the drum was re-labeled on 10-1-99 and given that date for the accumulation date. The drum has not been maintained to prevent a release per 22CCR66265.173, improper accumulation date per 22CCR66262.34(f)(2), container is not in good condition as required per 22CCR66265.171 and is in violation of the accumulation time per 22CCR66262.34(c).

Picture #8 is a 55-gallon steel drum (SFSFD #5) located in Area #3. The drum is empty, but not labeled as empty as per 22CCR66261.7(e) and has not been managed within one year as required per 22CCR66261.7(b).

Picture #10 is a 55-gallon steel drum (SFSFD #6) located in Area #3. The drum is in poor condition and does not meet the requirement for a container in good condition as per 22CCR66265.171, did not have a label at the time of the September 28, 1999 inspection as required per 22CCR66262.34(f)(3), has exceeded the accumulation time for the storage of waste per 22CCR66262.34(c) and has not had a waste determination made on the contents (labeled as "various") as per 22CCR66262.11.

Picture # 11 is of a 55-gallon steel drum (SFSFD #7) located in Area #5. The drum has no label on it as per 22CCR66262.32(f)(3) indicating what is in the drum. The generator has not made a waste determination per 22CCR66262.11, there is no accumulation date per 22CCR66262.34(f)(2), and the drum has been stored longer than the accumulation allows per 22CCR66262.34(c).

Picture # 12 is of two (2) 55-gallon steel drums located in Area #5 that were marked "empty" on April of 1995. The drums indicate that they have not been managed within one year as required per 22CCR66261.7(f).

Picture #13 is of a 55-gallon steel drum (SFSFD #8) located in Area #5. The drum has no label on it as required by 22CCR66262.34(f)(3), no waste determination as per 22CCR66262.11, and is past the accumulation time per 22CCR66262.34(c).

Picture #14 is of a 55-gallon steel drum (SFSFD #9) located in Area #5. The violations on this drum are the same as the container marked SFSFD #8 with the addition of the container not being of good condition as required per 22CCR66265.171

Picture # 15 is of a 55-gallon steel drum (SFSFD #10) located in Area #5. The drum is empty, but has not been managed within one year as required per 22CCR66261.7(b). The drum has no label on it and may have contained waste when originally stored, but now the bottom of the drum has rotted out and any material that was in it would be gone. No waste determination was made on this drum as required per 22CCR66262.11.

Picture #16 is of a 55-gallon steel drum (SFSFD #11) located in Area #5. This drum has identical violations as SFSFD #9 also located in Area #5 in that the drum is not labeled as per 22CCR66262.34(f)(3), no waste determination per 22CCR66262.11 and is past the generator accumulation time as per 22CCR66262.34(C).

Picture #18 and #20 shows the storage arrangement in Area #5. The area was for the storage of empty containers and does not have proper aisle space as required per 22CCR66262.34(d)(2). The area is densely packed and there are several drums that contain waste, but do not have any labels indicating what the waste is. It was estimated by the Fire Department that there are approximately 1100 drums in Area #5.

PRELIMINARY CONCLUSION

Although the picture were taken from only Areas #3 and #5, they are a good representation of the violations that exist in the other areas (Area #1, #2, #4, #6 and the Coke Barn). The Fire Department estimated that there are around 1,800 containers in the seven areas and most have some type of violation

associated with them. Due to the severity of the violations, the number of violations and the extent of time the violations have existed, the Fire Department has made and assessment that the violations warrant a Class I Violation for the management of their hazardous waste. Using the Penalty Matrix found in 22CCR66272.63(d), the Extent of Deviation would be Major and the Potential and Actual Harm would be Moderate to Minor depending on the violation. The exact penalty can not be determined because the actual number of violations has not been completely defined at this time.

RECOMMENDATIONS

Based on the information from the initial inspection and direction from the City, the Fire Department is going to file Formal Enforcement Actions against CENCO Refinery. The type of enforcement will be in the form of an Administrative Order. The Fire Department does not have the information to complete the Administrative Order without the findings from the Site Characterization. The number of containers to be assessed in the investigation exceeds what is reasonable for the Fire Department (CUPA) to assess without outside help. It is the recommendation of the CUPA to have an outside contractor to assess each container and determine the contents and condition of each drum. This information can be used to determine if the material in the drums is a RCRA hazardous waste, a State hazardous waste or a non-hazardous waste. The classification of waste is critical in the determination of Potential and Actual Harm assessment in 22CCR66272.63(d). Once the report of the Site Characterizations has been completed, the Fire department will be able to assess CENCO with the Administrative Order.

APPENDIX VI

CENCO

SERVICES AGREEMENT

This Services Agreement is made as of the date shown below between The City of Santa Fe Springs (the "City"), with offices at Santa Fe Springs and Onyx Environmental Services ("Consultant").

WHEREAS, the Fire Department (the "Department") of the City, which is a Certified Unified Program Agency, conducted a hazardous waste inspection at the CENCO Refining Company ("CENCO") located at 12345 Lakeland Avenue, Santa Fe Springs, California (the "Site");

WHEREAS, during this inspection the Department found circumstances and conditions that merit further investigation to determine whether there has been improper management of containers or other potential violations of the California Health and Safety Code or other state or federal laws and city ordinances;

WHEREAS, the Department has determined to retain a consultant to perform a further inspection and investigation of the Site in order to properly characterize certain areas of the Site;

WHEREAS, the City has entered into a reimbursement agreement with CENCO for Consultant services for the Site;

WHEREAS, Consultant has successfully bid for the investigation of the Site;

NOW, THEREFORE, in consideration of the foregoing, the City and Consultant agree as follows:

1. SERVICES PROVIDED

Consultant shall provide and direct the necessary qualified personnel to perform the services described in the attached Scope of Work required of and from it pursuant to the express and implied terms hereof, with the degree of skill and judgment normally exercised by recognized professional firms performing services of a similar nature and to the reasonable satisfaction of the Department.

The City cannot warrant the safety of the Site. However, if Consultant requests that work areas be secured, the Department shall secure such work areas to the best of its ability and prevent anyone other than Consultant's personnel from entering the designated work areas.

2. INDEMNIFICATION

Consultant agrees to indemnify, defend and save the City, its officers, employees and contractors, harmless from and against any and all liability which the City may be responsible for or pay out as a result of bodily injuries (including death), property damage, or any violation or alleged violation of law, to the extent caused by Consultant's breach of this Agreement or any negligent act, negligent omission or willful misconduct of Consultant, its employees, or contractors, which occurs (1) during the management, collection or transportation of any hazardous wastes or other waste materials (collectively "Waste Materials"), or (2) as a result of the disposal of any Waste Materials in a facility owned by Consultant or its affiliated companies.

The City agrees to indemnify, defend and save Consultant harmless from and against any and all liability which Consultant may be responsible for or pay for as a result of bodily injuries (including death), property damage, or any violation or alleged violation of law to the extent caused by the City's breach of this Agreement or by any negligent act, negligent omission or willful misconduct of the City or its employees in the performance of this Agreement.

Neither party shall be liable to the other for consequential, incidental or punitive damages.

3. FEES

Following receipt of an itemized invoice for services rendered, the City shall pay Consultant within 30 days.

4. TERM

The term of this Agreement will be for one (1) year from the date below or upon completion of the Scope of Work, whichever occurs sooner. Either party may terminate this Agreement by giving the other 30 days' notice of termination.

5. LICENSES

Consultant shall obtain any and all licenses and permits required by federal, state or local statutes, regulations or ordinances necessary for the performance of its services pursuant to this Agreement.

6. CONFORMANCE WITH LAW

While on the Site, Consultant shall impose work orders on its employees and subcontractors which are designed to assure that they comply with all applicable federal, state and local laws and regulations (including occupational safety and environmental protection statutes and regulations) in performing the services hereunder, and shall comply

with any directions of the Department and any other governmental agencies relating to site safety, security, traffic or other like matters.

7. CONSULTANT'S INSURANCE

At all times during the performance of this contract, Consultant shall provide and maintain at its own expense a policy or policies of insurance providing general liability, automobile and truck liability, and workers' compensation and employer's liability covering all activities of Consultant in performing or failing to perform the services described in this contract, with coverage limits which equal or exceed the minimum levels set forth below for each event and for total annual policy claims. Consultant shall provide a Certificate(s) of Insurance naming the City and CENCO as additional insureds for the full benefits of Consultant's policy(ies) for general liability and provide Certificates of Insurance for automobile and truck liability and workers' compensation/employer's liability in accordance with the minimum levels set forth below, which Certificates shall provide for at least thirty (30) days written notice to the City and CENCO of cancellation or change of coverage. The Certificate(s) relating to general liability shall make clear that the City and CENCO are fully insured under said general liability policy(ies) for any liability covered by said policy(ies).

General Liability – Bodily Injury And property damage	$1,000,000 per occurrence $2,000,000 general aggregate
Automobile/Truck Liability Bodily injury and property damage	$1,000,000 combined single limit
Workers' Compensation and Employer's Liability	Statutory $500,000

8. MISCELLANEOUS

This Agreement will be governed by the State of California, and is binding on the successors and assigns of both parties. The indemnification made by the parties will survive termination of this Agreement. No waiver by either party of any default by the other party in the performance of any portion of this Agreement shall operate as or be construed as a waiver of any future default, whether like or different in character. Moreover, if any portion of this Agreement is deemed invalid, the remainder of the Agreement shall be valid and enforced to the fullest extent permitted by law.

Should it be necessary for either party to initiate legal proceedings to enforce any term or condition of this Agreement, the prevailing party shall be entitled to all costs and expenses, including reasonable attorneys' fees incurred in such proceedings. This Agreement supersedes any prior Agreements between the parties for locations and

services covered by this Agreement. The terms and conditions appearing on the City's purchase orders or other form order documents shall be null and void.

During the performance of the work should the Consultant experience a slowdown or stoppage in the scope of work or it is necessary to suspend the work caused by the City or any federal, state, or local agency, Consultant will provide Customer a field change order covering the scope of the change and approximate costs if available and the City will extend the period of performance. All efforts will be made by ONYX to notify the Customer, in writing, as soon as is practical concerning said change or changes. ONYX shall perform each item of extra work so ordered, furnishing all labor, materials, tools, equipment, supplies, transportation, utilities and other facilities necessary for the proper execution and completion of such extra work, in the same manner as if such extra work were originally set forth in the contract documents, so long as the change is not required to be completed prior to continuance of original scope of work. In the event the original scope of work cannot be performed until the change order is approved and added to the original scope of work, ONYX will stop all work, and will remain on standby for one (1) hour, during which time the Customer will need to act on the change order. If Customer is not able to act on such change order within the specified "standby" time period, ONYX reserves the right to demobilize and leave the job site. Customer will be responsible for all charges incurred for work completed to-date, including all demobilization charges. Equipment that may not be practical to remove from the site that day (i.e.; roll-off boxes, fork-lifts etc.) will be charged at the daily rate for such equipment as originally quoted. If not quoted, Customer will be charged at the usual and customary rate, until the equipment is actually removed from the site, including any equipment pick-up fees. If Customer acts upon and agrees to the field change order after ONYX has already demobilized and left the jobsite, the Customer will be charged for any and all remobilization costs, which may include a fee of $1,500.00 per day up to forty-eight hours. This rate would be charged in the event other ONYX customers need to be rescheduled. In the event ONYX is able to reschedule and continue work on Customer's site at its convenience, the $1,500.00 fee would not apply; however, remobilization fees would still be applicable.

IN WITNESS WHEREOF, this Agreement has been signed by the authorized representatives of the parties on Monday, December 27, 1999.

ONYX ENVIRONMENTAL SERVICES, LLC	CITY OF SANTA FE SPRINGS
By: _____	By: _____
Name: GARY BROWN	Name: NEAL WELLAND
Title: GENERAL MANAGER	Title: FIRE CHIEF

ACORD CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YY) 01/05/2000

PRODUCER

Serial # 500836

Aon Risk Services,Inc of NY
Two World Trade Center
New York, NY 10048
Fax (212) 479-3264

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED

ONYX ENVIRONMENTAL SERVICES, LLC
4227 TECHNOLOGY DRIVE
FREMONT, CA 94538

COMPANIES AFFORDING COVERAGE

COMPANY A: RELIANCE NATIONAL INDEMNITY COMPANY

COMPANY B: NATIONAL UNION FIRE INSURANCE CO. OF PITTS. , PA

COMPANY C: CNA (LED CONSORTIUM OF CARRIRES)

COMPANY D:

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED B Y THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES, LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS		
A	GENERAL LIABILITY	NGB 0156970-00	06/30/1999	06/30/2000	GENERAL AGGREGATE	$	2,000,000
	X COMMERCIAL GENERAL LIABILITY				PRODUCTS - COMP/OP AGG	$	2,000,000
	CLAIMS MADE X OCCUR				PERSONAL & ADV INJURY	$	1,000,000
	OWNER'S & CONTRACTOR'S PROT				EACH OCCURRENCE	$	1,000,000
					FIRE DAMAGE (Any one fire)	$	500,000
					MED EXP (Any one person)	$	10,000
A	AUTOMOBILE LIABILITY	NKA 0156966-00 A/O/S NKA 0156967-00 VA NKA 0156968-00 TX NAM 0156969-00 MA	06/30/1999	06/30/2000	COMBINED SINGLE LIMIT	$	1,000,000
	X ANY AUTO				BODILY INJURY (Per person)	$	
	ALL OWNED AUTOS						
	SCHEDULED AUTOS				BODILY INJURY (Per accident)	$	
	HIRED AUTOS						
	NON-OWNED AUTOS				PROPERTY DAMAGE	$	
	X MCS-90						
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT	$	
	ANY AUTO				OTHER THAN AUTO ONLY:		
					EACH ACCIDENT	$	
					AGGREGATE	$	
B	EXCESS LIABILITY	BE 7011705	06/30/1999	06/30/2000	EACH OCCURRENCE	$	15,000,000
	X UMBRELLA FORM				AGGREGATE	$	15,000,000
	OTHER THAN UMBRELLA FORM					$	
A	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	NWA 0156965-00	06/30/1999	06/30/2000	X WC STATUTORY LIMITS / OTHER		
	THE PROPRIETOR/ PARTNERS/EXECUTIVE OFFICERS ARE: INCL / EXCL				EL EACH ACCIDENT	$	1,000,000
					EL DISEASE - POLICY LIMIT	$	1,000,000
					EL DISEASE - EA EMPLOYEE	$	1,000,000
	OTHER						

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

THE CITY OF SANTA FE SPRINGS FIRE DEPARTMENT, THE CITY OF SANTA FE SPRINGS AND CENCO REFINERY ARE LISTED AS ADDITIONAL ISUREDS AS REGARDS THE WORK PERFORMED BY ONYX ENVIRONMENTAL SERVICES.

CERTIFICATE HOLDER

SANTA FE SPRINGS FIRE DEPARTMENT
ATTN: RICHARD KALLMAN
11300 GREENSTONE AVENUE
SANTA FE SPRINGS, CA 90670

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT. BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE OF AON RISK SERVICES, INC OF NY

J. Adam Jason

APPENDIX VII

CENCO

CENCO Refining Company

12345 Lakeland Road • Santa Fe Springs, CA 90670 • Phone (562) 944-6111 • Fax (562) 903-8911

John D. R. Wright
Executive Vice President
Corporate Development & Planning
Direct Phone (562) 906-6941
Direct Facs (562) 903-8931

April 5, 2000

Chief Neal Welland
Fire Department
City of Santa Fe Springs
Headquarters Fire Station
11300 Greenstone Avenue
Santa Fe Springs, CA 90670-4619

Re: Comments on Onyx Report

CENCO has received a copy of the drum assessment report prepared by Onyx on behalf of the City of Santa Fe Springs. Given that the report is not dated or signed, we are assuming it is still a draft and that it was provided to us for our review and comment. We have a number of concerns with the report, and therefore appreciate the opportunity to provide you with our comments. As explained in detail below, we believe the report is unclear in a number of respects, and that it contains numerous data gaps, factual inaccuracies and legal misunderstandings. The collective effect of these deficiencies is to undermine the conclusions reached in the report. CENCO believes the report needs to be corrected. In its current form, the report is prejudicial and does not provide a reliable basis upon which to assess the nature, extent or seriousness of violations which may have occurred.

Our specific comments are as follows:

1. Lack of Site Map. The report consists of a brief overview of seven areas where drums were stored at the refinery and a comprehensive spreadsheet listing all of the drums and hazardous characteristics reportedly determined by field testing. The report does not include a site map showing where the various storage areas are located. Although the seven areas appear to correspond to the areas originally designated by the Santa Fe Springs Fire Department (SFSFD), a site map should be included that clearly delineates the Areas 1-7. This is especially important since Area 5 (the empty drum storage area) and Area 6 (the east end of the contractor parking area) are the only two areas that have any relation to the "project" for CEQA purposes.

2. Failure to Acknowledge Lack of Environmental Harm. The report fails to make any reference to the fact that no environmental harm was discovered as a result of the storage of the drums.[1] Through its silence on this issue, the report erroneously implies that the storage of

[1] The report also fails to mention that a drum of wastewater was spilled by the ONYX assessment team.

the drums posed an environmental risk. In fact, Onyx's investigation confirmed that the vast majority of the drums at the refinery were either empty, contained nonhazardous materials, or contained valuable products that will be used by CENCO when the refinery resumes operations. By CENCO's count, of the approximately 1600 drums that were present, only six (6) drums, other than those located in the refinery's hazardous waste accumulation area, contained hazardous waste. Thus, the City's investigation confirmed CENCO's earlier views that the number of violations was very small relative to the total number of drums, and that none of the violations posed a significant risk to public health or safety or the environment.

3. Mischaracterization of Nonhazardous Drums as Hazardous. The report states that no data was provided by CENCO to support its position that many of the drums contained (or had contained) nonhazardous materials or wastes. CENCO offered on several occasions to provide information supporting its determination to both ONYX and the SFSFD if requested. However, neither Onyx nor SFSFD ever requested the data. The report inappropriately suggests that no supporting data is available and that CENCO's waste determinations cannot be supported. While it true that the generator of waste bears the risk of erroneous waste determinations, a drum that never contained hazardous waste does not become subject to regulation as a hazardous waste simply because supporting documentation was not reviewed by Onyx or the SFSFD. In point of fact, many of the hydrocarbons and other materials managed at the refinery are not "hazardous" under the Title 22 regulations.

4. Improper Classification of Empty Drums. The report concludes that because CENCO chose to manage the empty drums (988 of them) as "California hazardous," they were, in fact, subject to regulation as hazardous wastes. In this regard, Onyx concluded that the empty drums were not properly labeled and that they were stored in excess of the 90-day storage limit. Contrary to what is suggested by the report, CENCO managed the empty drums as "California hazardous" solely for convenience and to facilitate their timely removal from the refinery, NOT because CENCO believed them to be hazardous wastes. In fact, CENCO and the SFSFD agreed that Onyx's report would acknowledge that CENCO's decision to manage the empty drums as "California hazardous" was very conservative and that this action would not be construed as an admission or determination that all of the drums were, in fact, hazardous wastes.

Prior to sending the drums off-site for disposal, CENCO performed a survey of 600 of the empty drums (approximately 2/3 of the total) and found that at least 50 percent of them were completely free of residue or had originally contained only nonhazardous material. Assuming the drums that were surveyed were representative of the lot, at least 50% of the empty drums (approximately 490) cannot properly be classified as hazardous wastes. As such, these drums were not required to be labeled as hazardous waste and were not subject to the 90-day storage limit. With respect to the remaining drums, all of them —under a conservative, worst case analysis—were "California empty," meaning that they had been emptied of all

materials that could reasonably be removed by physical means. "Empty" drums do not need to be labeled as hazardous waste and are not subject to the 90-day storage limit.

5. Mischaracterization of "Potentially Hazardous" Drums. A total of 77 drums that CENCO had labeled as nonhazardous were reclassified by Onyx as "Potentially Hazardous." The report does not include any data to support the reclassification of these drums, and CENCO disagrees with Onyx's conclusion.

6. Factual Errors. The spreadsheets attached to the report contain numerous factual errors, as listed below:

(a) Area 1

1. Drum #17 is listed as containing toluene, waste flammable liquid. This is incorrect. The contents of this drum was analyzed and did not exhibit the characteristic of ignitability.
2. Drum #18 and #19 are listed as containing isooctane, waste flammable liquid. CENCO analyzed the material in these drums, and it did not contain any VOCs or exhibit the characteristic of ignitability.
3. Drum #45 is listed as containing used oil, described as a "brown liquid, insoluble in water." This is incorrect. The drum actually contains antifreeze, which is a clear green liquid that is soluble in water.
4. Drum #163 and #164 are listed as containing methanol, waste flammable liquid. However, the material did not exhibit the characteristic of ignitability and thus is not methanol. Furthermore, these drums were nearly empty (each contained less than one inch of material).
5. Drum #32, #44 and #49 are listed as containing "used oil or oily waste," identified as either "Cal Haz or Excluded Over 1Yr." This is incorrect. Each of these drums contains nonhazardous industrial wastewater.

(b) Area 3

1. Drum ## 124, 125, 131, 132, 133, 139, 142, 143, 145, 152, 154, 168, 173, 178, 179, 182, 185, 187, 196, 197, 198, 209, 211, 212, 213, 214, 227 are listed as containing "used oil or oily waste," identified as either "Cal Haz or Excluded Over 1Yr." This is incorrect. Each of these drums contains nonhazardous industrial wastewater.
2. Drum ## 126, 172, 204, 205, 206, 207, 208 are listed as containing material. In fact, each of these drums contained less than one inch of material and was thus "RCRA empty." Furthermore, the material in these drums is described as oily waste and is thus believed by CENCO to be nonhazardous.

3. Drum #151 is listed at containing oil filters. This is incorrect. The drum is a closed-top drum containing nonhazardous industrial wastewater.

4. All drums containing vacuum resid and vacuum coker are incorrectly identified as "Excluded Over 1 Yr." Both of these materials are nonhazardous. In addition, vacuum resid is not an oxidizer, contrary to what is listed under Drum # 192.

5. Drum #193 is identified as containing sulfuric acid. This is incorrect. This drum was half-full of a dilute material that is believed to be nonhazardous. Onyx did not run a pH test on the material and thus cannot confirm that it exhibited the characteristic of corrosivity.

(c) Area 5

1. Drum #889 is identified as containing soil borings that are "potentially" California hazardous. This is incorrect. This drum is a closed-top drum that contains nonhazardous industrial wastewater.

2. Drum #891 and #904 are listed as containing an unknown, hazardous white solid. This is incorrect. Both of these drums contain unused spill control products (boom material).

3. Drum #909 is identified as containing ethylene dichloride." A VOC analysis was run on this material, which came back non-detect. The material is therefore not ethylene dichloride.

4. Drum #932 is listed as containing used oil or oily waste, identified as either "Cal Haz or Excluded Over 1Yr." This is incorrect. This drum contains nonhazardous industrial wastewater.

5. Drum ## 919, 920 and 925 are listed as containing material. In fact, each of these drums contained less than one inch of material and was thus "RCRA empty." Furthermore, the material in these drums is described as oily waste and is thus believed by CENCO to be nonhazardous.

(d) Area 7

1. Drum ## 133, 221 and 222 are listed as containing material. In fact, each of these drums contained less than one inch of material and was thus "RCRA empty." Furthermore, the material in these drums is described as oily waste and is thus believed by CENCO to be nonhazardous.

* * * * *

over flowed the top and was crusted on the lid. The closeness of the containers and storage conditions made the situation a major potential for harm. This is a Class I violation. This violation occurred one time.

9) A violation of the California Code of Regulations, Title 22, Section 66265.16 for failure to meet the personnel training requirements. Employees who handle hazardous waste shall successfully complete a program of instruction that teaches them to perform their duties in a way that ensures the facility's compliance with the generator requirements found in the California Code of Regulations. During the file review, no documents were presented showing the employees had received the necessary training nor did the condition of the storage areas indicate that they were competent in hazardous waste compliance. This is a Class II Violation. This is a one-time violation.

10) A violation of the California Code of Regulations, Title 22, Sections 66262.34(a)(4) and 66262.40(a) for failure to maintain the final copy of manifest 98585169 for hazardous waste shipped on 11-4-98. The facility could not indicate that the shipment had been received by the Treatment, Storage, Disposal Facility (TSDF). This is a Minor Violation. This violation occurred one time.

SOIL PILE VIOLATIONS

The City requested that the CUPA sample the soil piles because they were located in an area that could have potentially affected the EIR process for the refinery's upgrade project. This area, the area north of the Coke Barn, is designated as overflow contractor parking for the project. The City was concerned about possible contamination resulting from the storage of the drums and soil piles in that area. Thus, the City requested that the soil piles and the soil near the drums be sampled to determine whether there was any significant contamination, which would impact the environment and the project.

The soil piles were analyzed for materials that were not previously analyzed by Powerine/CENCO in their waste determination. Soil samples were taken "downstream" from the drums. While soil samples "downstream" from the drums did not show any significant contamination, results from the samples taken from the soil piles indicated that one sample exceeded the California

threshold levels for zinc and two samples exceeded the levels for lead. Therefore, Powerine and CENCO are subject to the following violations:

11) A violation of the California Code of Regulations, Title 22, Section 66262.11, for failure to make a hazardous waste determination. CENCO failed to test for the California Characteristics of Toxicity. The results of the sampling indicated that the soil contained metals greater than the Total Threshold Limit Concentration (TTLC) for zinc and lead. CENCO confirmed the CUPA's findings when it took two samples around the boring that yielded the high zinc levels exceeding the TTLC. See Letter from Versar to Neil Norcross dated April 18, 2000 re: Work Plan for Further Characterization of Stockpiled Soil at the Bloomfield Property attached as Appendix XI. Thus, CENCO's consultant advised CENCO to remove two of the grid cells (25' x 25' each) in Stockpile 1. The failure to make a proper waste determination here is a Class I violation. The occurrence for this violation is one time.

12) A violation of the Health and Safety Code, Section 25201 and of the California Code of Regulations, Title 22, Section 66262.34(a), for the storage of hazardous waste (soil contaminated with zinc) longer than 90 days. The soil was moved from 12354 Lakeland and stored on the Bloomfield property since 1997. In addition, the soil was not properly contained or labeled while being stored at the Bloomfield property. This is a Class I violation. The occurrence for this violation is one count of California Only waste stored for longer than 90 days.

POTENTIAL VIOLATIONS

There were many conditions at the refinery that contributed to potential violations, but were not completely assessed in the field during the ONYX site investigation. There were several drums of solid material at the refinery that passed the field screen tests, but may have failed the State tests for toxicity. The State test for toxicity consists of a metal screen, a pesticide screen and a fish bioassay test for aquatic toxicity. The toxicity tests cannot be run in the field and are extremely costly. For this reason, the Fire Department will allow CENCO to use generator knowledge for waste determination if it can be documented to the CUPA's satisfaction.

For the drums listed by ONYX as Potentially Hazardous Waste in the ONYX Report, CENCO shall submit reasonable documentation demonstrating the waste is non-hazardous as claimed by the refinery. The documentation shall include the ONYX assigned drum number and reasons why the waste is not hazardous (lab results, process is non-hazardous, Material Safety Data Sheets showing material is non-hazardous, etc). CENCO shall also submit procedures on how the refinery will determine if the waste is hazardous or non-hazardous and procedures on how the refinery will separate hazardous waste from non-hazardous waste in the future.

The drums listed by ONYX as Potentially Hazardous Waste are: 1C-1, 1C-3, 1C-4, 1C-5, 1C-6, 1C-7, 1C-8, 1C-9, 1C-14, 1C-21, 1C-22, 1C-23, 1C-31, 1C-35, 1C-51, 1C-52, 1C-53, 1C-54, 1C-55, 1C-57, 1C-58, 1C-59, 1C-60, 1C-61, 1C-62, 1C-63, 1C-65 through 1C-95, 1C-100, 1C-102, 1C-103, 1C-104, 1C-105, 1C-106, 3C-117, 3C-131, 3C-160, 3C-161, 3C-186, 3C-188, 3C-226, 3C-231, 3C-234 through 3C-238, 3C-240, 3C-243, 5C-888, 5C-890, 5C-898, 5C-900, 6C-17. The total number of Potentially Hazardous Waste drums is 84.

CONCLUSION

Based on the information the CUPA has received in this investigation, the CUPA has determined that CENCO and Powerine have violated the regulations and laws pertaining to the management of hazardous waste. Because the violations are significant and the management knew of these violations yet failed to correct them prior to the CUPA's inspection, the CUPA has referred the matter to the City Attorney's office and the Attorney General's office for Civil Enforcement.

Steve Koester

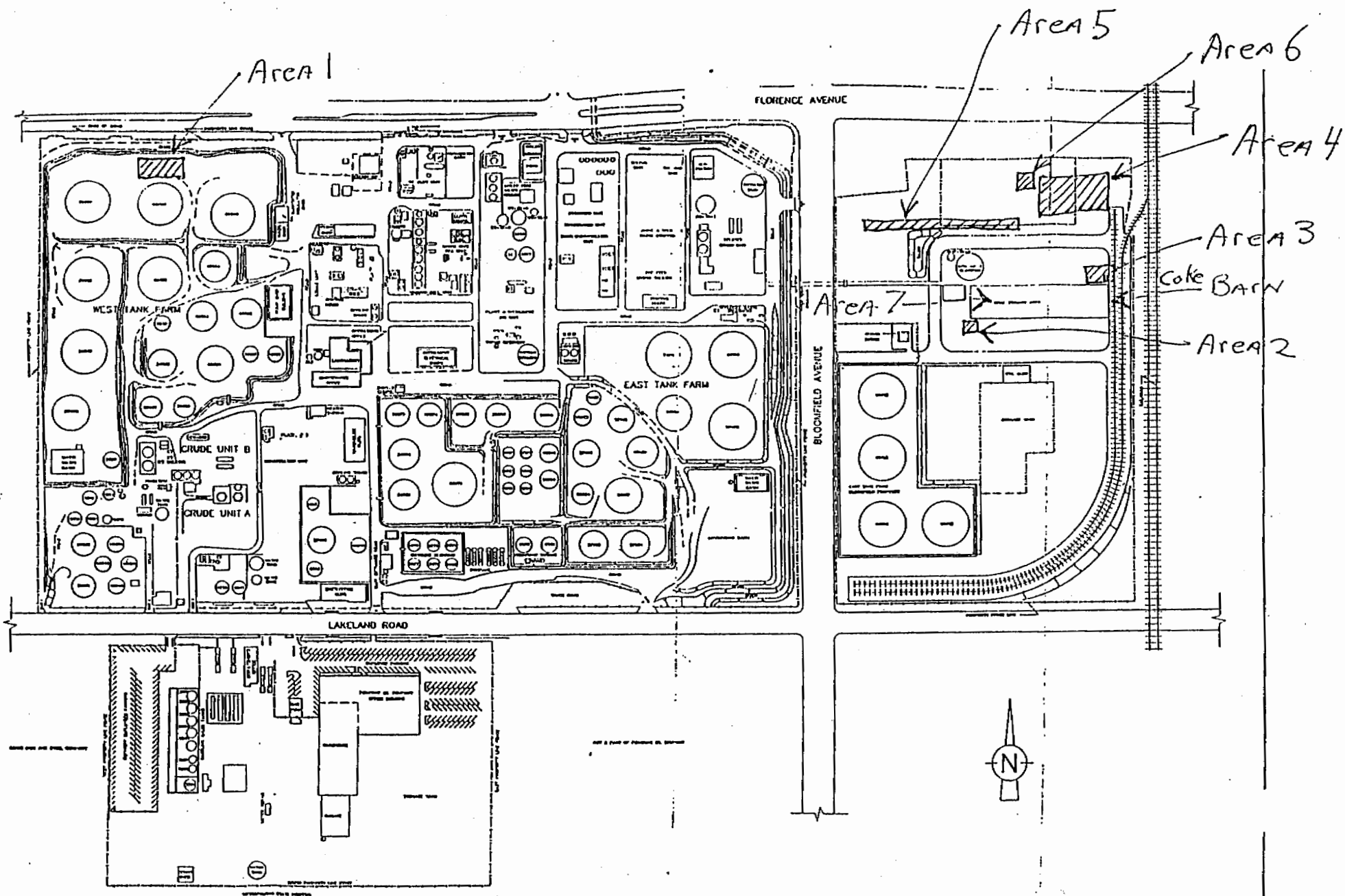
Steve Koester, Env. Protection Splst.
Environmental Protection Division
City of Santa Fe Springs Fire Dept.

Neal Welland

Neal Welland, Fire Chief
City of Santa Fe Springs Fire Dept.

APPENDIX I

CENCO



R.L. WOOD & ASSOCIATES, INC.
Engineers
16331 Gothard Ave., Suite H (714) 841-6774
Huntington Beach, California, 92647

POWERINE Oil Company
12334 Lakeland Road, P.O. Box 2108
Santa Fe Springs, CA 90670-9863

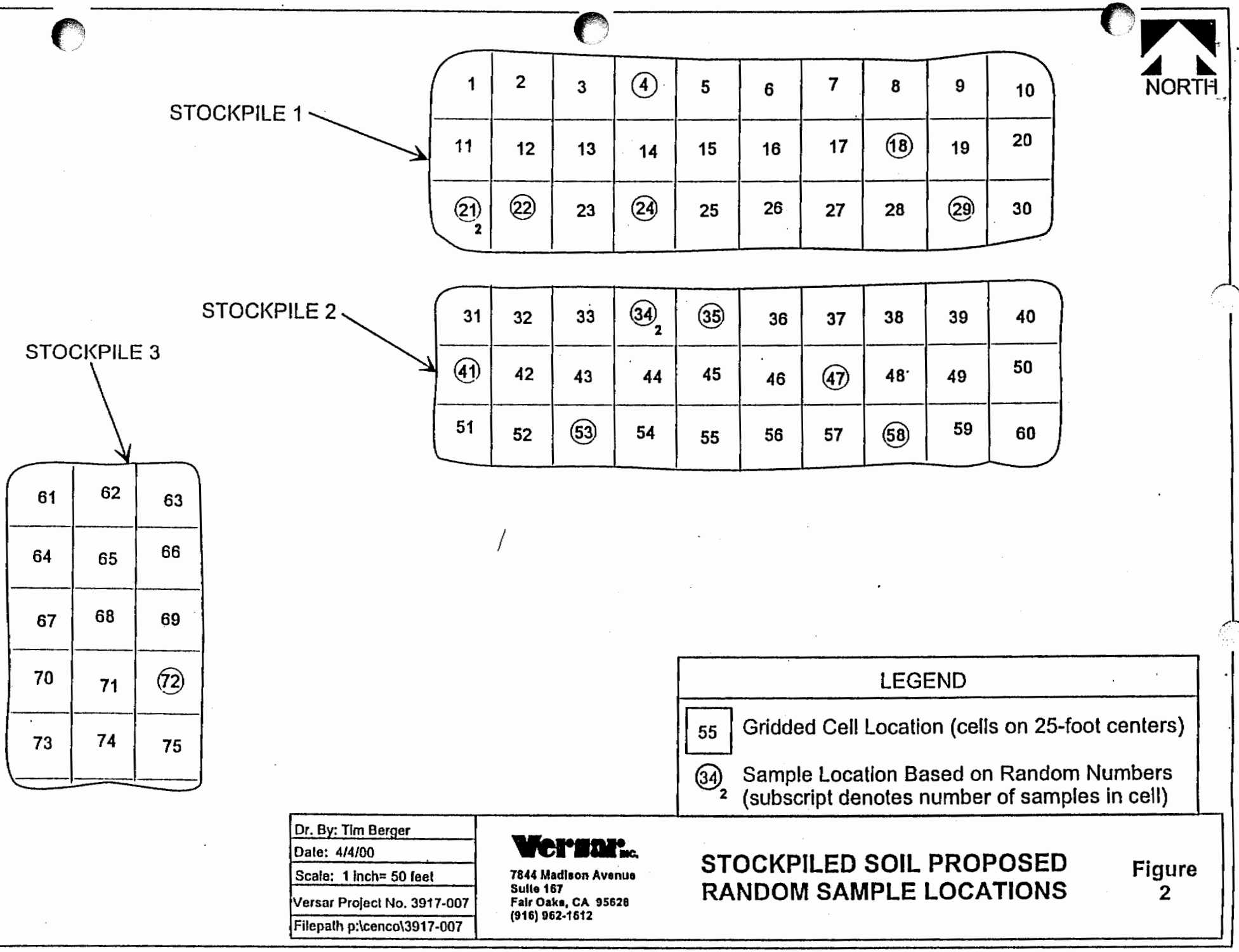
REFINERY OVERALL
PLOT PLAN

1" = 80'

APE-3315

APPENDIX II

CENCO



Dr. By: Tim Berger	
Date: 4/4/00	
Scale: 1 inch= 50 feet	
Versar Project No. 3917-007	
Filepath p:\cenco\3917-007	

Versar INC.
7844 Madison Avenue
Suite 167
Fair Oaks, CA 95628
(916) 962-1612

STOCKPILED SOIL PROPOSED RANDOM SAMPLE LOCATIONS

Figure 2

APPENDIX III

CENCO

REIMBURSEMENT AND ACCESS AGREEMENT FOR SITE CHARACTERIZATION AT CENCO FACILITY

This Agreement is made by and among the companies, agencies, and individuals whose authorized representatives have executed this Reimbursement Agreement.

WHEREAS, on September 28, 1999, the Fire Department (the "Department") of the City of Santa Fe Springs (the "City"), which is a Certified Unified Program Agency, conducted a hazardous waste inspection at the CENCO Refining Company ("CENCO") located at 12345 Lakeland Avenue, Santa Fe Springs, California (the "Site");

WHEREAS, during this inspection the Department found circumstances and conditions that merit further investigation to determine whether there has been improper management of containers or other potential violations of the California Health and Safety Code or other state or federal laws and city ordinances;

WHEREAS, the Department has determined to retain a contractor to perform a further inspection and investigation of the Site in order to properly characterize such areas of the Site described below;

NOW, THEREFORE, in consideration of the foregoing, the Department and CENCO agree as follows:

1.0 Effective Date

1.1 This agreement is effective upon execution, and shall be retroactive to September 28, 1999.

2.0 Warranty of Authority

2.1 Each person signing this Agreement represents and warrants that he or she has been duly authorized to enter into this Agreement by the company, or agency, or individuals on whose behalf the person indicates he or she is signing for.

3.0 Preservation of Site

3.1 CENCO agrees to preserve two areas of the Site that have been secured (cordoned off) by the Department and CENCO (collectively "Secured Areas"). The two areas are described as follows:

1) the hazardous waste drum storage area which is on the main property adjacent to Florence Avenue; and

2) the cordoned-off portion of the Bloomfield property (including the coke barn) which is north of Lakeland, east of Bloomfield Avenue, and south of Florence Avenue in the City of Santa Fe Springs.

3.2 CENCO employees, agents, and contractors shall not access the Secured Areas except as allowed by this Agreement or by written authorization from the Department.

3.3 CENCO's employees, agents and contractors and the engineering firm that operates on the Bloomfield property shall have access to the Bloomfield property except for the cordoned-off portion of the Bloomfield property, however, they shall preserve the integrity of the Secured Areas and shall not interfere with the inspection activities of the Department.

4.0 Contractor and Scope of Work

4.1 The City and the Department shall retain a contractor to assist in the further investigation and characterization of the Secured Areas of the Site, which contractor shall perform in an efficient and cost effective manner.

4.2 The work to be performed by the contractor shall be as generally as set forth in the attached proposed Scope of Work.

4.3 The City and Department reserve the right to amend the Scope of Work attached hereto in the event that the discovery of changed conditions or circumstances at the Secured Areas of the Site require additional work by the contractor to protect health and safety or comply with state or federal regulatory requirements.

5.0 Access to the Site

5.1 CENCO shall grant the Department and its contractors full access at any time to the two Secured Areas and shall in no way interfere with the inspection, characterization, and sampling activities of the Department and its contractors. Ordinarily, access shall be between 7 a.m. and 7 p.m., or alternative hours as mutually agreed between the parties.

5.2 The Department's right of access described in Section 4.1 shall continue until it accomplishes characterization of the Secured Areas of the Site and delivers its inspection report to CENCO.

5.3 Before entering the refinery, Contractor's personnel shall complete CENCO's normal contractor health and safety training course. The Department shall have the right to

observe the training course. In addition, Contractor shall provide documentation showing insurance coverage as described in the Scope of Work. When at the refinery, Contractor's personnel shall be accompanied by the CENCO liaison, described in paragraph 6.1 below, or such other CENCO personnel as designated by the liaison.

6.0 Liaison

6.1 CENCO shall appoint a liaison for the purpose of providing technical support and information regarding environmental conditions on the Secured Areas of the Site. The Department shall consult with this designated liaison during its inspection and investigation. CENCO shall the right to have the liaison observe the activities of the Department and its contractors on site. The liaison shall not interfere with the inspection activities on the properties.

7.0 Reimbursement

7.1 CENCO shall reimburse the City for all costs incurred in the process of investigating and characterizing the two Secured Areas of the Site set forth above. These costs shall include, but are not limited to:

1) Costs incurred by contractors retained by the Department, including but not limited to, sampling and laboratory costs;

2) Overhead and administrative costs incurred by the Department and/or the City including, but not limited to oversight and supervision costs, legal fees, and miscellaneous administrative costs.

7.2 The City shall provide CENCO with a full accounting of the costs incurred, and CENCO shall reimburse the Department within 30 days of receiving the invoice for said costs.

8.0 Miscellaneous

8.1 This Agreement constitutes the entire agreement of the parties with regard to the matters set forth herein. The parties expressly acknowledge and agree that no adequate remedy is available at law for a breach of this Agreement and that, in addition to any other remedies available, specific performance of this Agreement may be ordered or a breach thereof enjoined, or both.

8.2 This Agreement does not constitute an administrative penalty for any violation or potential violation of the California Health and Safety Code or any other state or federal law and therefore does not in any way limit the Department's authority to penalize CENCO for any determined violation(s).

8.3 In the event that CENCO breaches this agreement, the Department may factor said breach into the assessment of the potential penalty amounts for any violations which may be found.

8.4 Modifications of this Agreement may be made if such modifications are in writing and signed by the parties.

IN WITNESS WHEREOF, the parties hereto, which may be by and through their properly authorized and appointed counsel, enter into this Agreement.

DATED: October 22, 1999 The City of Santa Fe Springs

By Neal Welland

DATED: October 22, 1999 CENCO Refining Company

By J. L. Lowe PRESIDENT.

APPENDIX IV

CENCO

NOTICE INVITING BIDS
FOR

CENCO REFINERY
SITE CHARACTERIZATION
HAZARDOUS WASTE STORAGE AREAS

SCOPE OF WORK

BID CRITERIA

NOTICE IS HEREBY GIVEN by the City of Santa Fe Springs Fire Department, inviting written sealed bids for the above-stated project. Bids must be submitted to the office of the Fire Department Headquarters at 11300 Greenstone Avenue, Santa Fe Springs, by 5:00 p.m., November 19, 1999, at which time they will be opened.

Bids must be submitted in writing in conformance with the requirements contained in this document. All bids shall be submitted in a sealed envelope, plainly marked on the outside.

A job walk will be conducted on November 16, 1999 at 10:00 a.m. The address of the site is 12345 Lakeland Rd., Santa Fe Springs at Gate 4. Please bring a hardhat and safety glasses for the job walk.

The successful bidder shall be licensed in accordance with the provisions of the Business and Professions Code and shall be required to obtain a business license from the City of Santa Fe Springs.

The Contractor shall not have performed any type of Hazardous Waste services for CENCO or Powerine Oil Refinery within the past 5 years (October, 1995).

All bids shall include Contractor's qualification for performing Site Characterization of Hazardous Waste Sites. Items to be included, but not limited to: types of training, training records, experience specifically related to this project, ability to determine Hazardous Waste Storage violations. Qualifications shall be submitted in an appendix to the bid.

Upon completion of the work, payment shall be made in full, 30 days from invoice date.

The work to be done consists of furnishing all materials, equipment, tools, labor, and incidentals as required by the job. The bid can be done on a per drum, per field sample, per laboratory sample collection, per overpak, etc. An estimation of 1800 drums are within the areas to be characterized by this project. Upon completion of work, all containers in the areas will be identified, labeled, secured and properly stored.

The work shall be completed in a timely manner and in agreement with the Fire Department. Actual completion date will depend on factors identified in the Site Characterization and Sampling Plan.

Before entering the refinery, Contractor's personnel shall complete CENCO's normal contractor health and safety training course.

The equipment and processes at the refinery include trade secrets of CENCO, or trade secrets of others, which CENCO is obligated to protect. AGENCY and Contractor shall not take photographs of equipment or materials except as necessary and relevant to the investigation described in this Agreement. Copies of all photographs shall be included as part of the final investigation which will be provided to CENCO at the end of the investigation.

Contractor's access to the site shall be limited to the hours between 7:00 a.m. and 6:00 p.m., Monday through Friday and only when accompanied by the CENCO liaison or a CENCO employee designated by the liaison and a designated Fire Department representative.

At all times during the performance of this contract, Contractor shall provide and maintain, at its own expense, a policy or policies of insurance providing general liability, automobile and truck liability, and workers' compensation and employer's liability covering all activities of Contractor in performing or failing to perform the services described in this contract, with coverage limits which equal or exceed the minimum levels set forth below for each event and for total annual policy claims. Contractor shall provide a Certificate(s) of Insurance naming CENCO as an additional insured for the full benefits of Contractor's policy(ies) for general liability and provide Certificates of Insurance for automobile and truck liability and workers' compensation/employer's liability in accordance with the minimum levels set forth below, which Certificates shall provide for at least thirty (30) days written notice to CENCO of cancellation or change of coverage, The Certificate(s) relating to general liability shall make clear that CENCO is fully insured under said general liability policy(ies) for any liability covered by said policy(ies), and underwriters waive their rights of subrogation against CENCO.

General Liability – bodily injury and property damage	$1,000,000 per occurrence $2,000,000 general aggregate
Automobile/truck Liability- bodily injury and property damage	$1,000,000 combined single limit
Workers' Compensation and Employer's Liability	$500,000 statutory

PROJECT DESCRIPTION

1. Contractor shall take samples from drums, tote-bins and roll-off bins as well as areas impacted by releases from these and other related containers. The number of samples shall be determined by Fire Department and contractor personnel. It is the intent of the Fire Department to require samples be taken by family of materials (drum groups which contain the same material). Not all drums will be required to be sampled. The exact number of samples to be taken is not known.

2. Samples for laboratory analysis shall be taken in accordance with State Sampling Guidelines. Tests to be run may include, but not be limited to: ignitability, toxicity, corrosivity, and reactivity as well as specific chemical analysis.

3. All samples for laboratory analysis shall be split, and a portion of each sample shall be provided to CENCO. Contractor shall ensure all samples and materials are properly documented (labels, numbering system, field log, photographs, chain of custody forms, etc.). All sampling shall ensure proper preservation and integrity. Contractor shall deliver laboratory samples to State certified laboratory at the direction of the Fire Department. Cost for laboratory analysis is not part of this bid and will be handled directly by the City of Santa Fe Springs.

4. Contractor shall supply all drum handling equipment, sampling equipment, safety equipment, labeling and marking equipment as well as materials necessary for in-field hazard determination.

5. All personnel shall have the appropriate level of training necessary to work at waste sites per 29 CFR 1910.120 and 8 CCR 5192. Proof of training shall be part of the bid. Contractor shall develop a Site Safety Plan, and a Quality Assurance/Quality Control Plan to be approved by the Fire Department prior to commencement of any work.

6. All unknown materials shall be sampled using a minimum of Level B for Personal Protective Equipment.

7. Contractor shall provide a Final Report of the findings from the Site characterization to the Fire Department and to CENCO. Included in the report shall be the storage condition and disposition of each drum in the designated areas and any contamination resulting from the storage of the containers. Contractor shall use the results from the field analysis, laboratory analysis and information from the CENCO liaison to make a waste determination and shipping description for each waste container and any surface contamination. Also included in the Final Report shall list all violations per the Hazardous Waste Storage Requirements found in Title 22 of the California Code of Regulations and Chapter 6.5 of the California Health and Safety Code.

8. Transportation and disposal of the materials on the site are not part of this bid and should not be included in the cost of the project. Any disposal costs will be handled through the business and not the Fire Department. Any questions regarding this bid should be addressed to Steve Koester, Environmental Protection Specialist, at 562-944-9713.

the CUPA found that the zinc concentration in the soil exceeded the Threshold Limit Concentration (TTLC) for zinc. As such, Cenco improperly characterized the soil in violation of Title 22, C.C.R. section 66261.11.

79. The City is informed and believes and thereon alleges that Cenco stored this contaminated soil on the Bloomfield Property for longer than 90 days without a permit.

80. Cenco and Powerine have never applied for authorization to store the contaminated soil at the Bloomfield Property, nor has the CUPA ever given Cenco or Powerine any authorization to store the contaminated soil. As such, Cenco violated and continues to violate Health and Safety Code section 25201.

REQUEST FOR RELIEF

DTSC requests that the Court grant the relief that follows:

A. Enter a judgment that Powerine and Does 1-10 are required to pay civil penalties to Plaintiffs according to proof pursuant to the First and Third Causes of Action;

B. Enter a judgment that Cenco and Does 1-10 are required to pay civil penalties to Plaintiffs according to proof pursuant to the Second and Third Causes of Action;

C. Enter temporary restraining orders, preliminary injunctions, permanent injunctions, or other orders requiring Cenco and DOES 1-10 to comply with the applicable permits, the HWCL and/or the regulations adopted thereunder; and

D. Grant Plaintiffs their costs of investigation; and

E. Grant Plaintiffs costs of suit herein; and.

F. Grant such other and further relief as the court deems just and proper.

The City and DTSC request that the Court grant the relief that follows:

A. Enter a judgment that Powerine and Does 1-10 are required to pay civil penalties to Plaintiffs according to proof pursuant to the Fourth, Fifth, Sixth, and Seventh Causes of Action;

B. Enter a judgment that Cenco and Does 1-10 are required to pay civil penalties to Plaintiffs according to proof pursuant to the Fourth, Fifth, Sixth, Seventh, and Eighth Causes of Action;

C. Enter temporary restraining orders, preliminary injunctions, permanent injunctions, or other orders requiring Cenco and DOES 1-10 to comply with the applicable permits, the HWCL and/or the regulations adopted thereunder; and

E. Grant the City costs of suit herein; and.

F. Grant such other and further relief as the court deems just and proper.

Respectfully submitted,

Dated: May 17, 2000

BILL LOCKYER, Attorney General
of the State of California
RICHARD FRANK
Chief Assistant Attorney General
DONALD ROBINSON
Supervising Deputy Attorney General

By: _____
JAMES POTTER
Deputy Attorney General Attorneys for Plaintiff, People of the State of California, ex rel Edwin F. Lowry, Director, California Department of Toxic Substances Control

STEVEN N. SKOLNIK, City Attorney
FULBRIGHT AND JAWORSKI L.L.P.

By: _____
PATRICIA J. CHEN
Attorneys for Plaintiff, People of the State of California, ex rel City of Santa Fe Springs

FINAL INSPECTION REPORT

CENCO OIL REFINERY

Santa Fe Springs Fire Department

September 15, 2000

Exhibit B Page 1 of 83